

– Wednesday, 08 July 2020 – 15:32:00

Subject	DENR - Consultation Form - 904190
From	
Sent	7/8/2020 3:32:00 PM

Contact details

First name: Shirley
Surname: Crane
Email address: *****
Country: Australia
Postcode: 0850
Phone number: *****
Stakeholder type: Community

Feedback

Activity you are providing feedback on: Imperial Oil and Gas Pty Ltd (IMP2-5): 2020 Drilling Program NT Exploration Permit (EP) 187 Revised Environment Management Plan

Category type: Water

If other, please specify::

Comments: When the current NT Government lifted the moratorium on fracking, the public was assured that there would be no wet season operations, in line with the Pepper Scientific Recommendations that declared wet season operations unsafe. The risk of environmental damage and water contamination is much higher in the wet season. It seems that the gas companies are eroding the recommendations one by one and are basically setting themselves up to do as they please. The 135 recommendations seem to have 'gone out the window' and the NT Government is doing very little to enforce them. Initially, we were assured that all 135 recommendations would be implemented before one well was drilled. We now know that the recommendations have been divided into groups - ones that are part of the exploration phase (which turned out to be a very small number), ones that seem to apply only to the production phase, ones that can't be implemented and, therefore, will just be forgotten about and ones that no one takes any notice of. There is little evidence that the NT Government has the capacity to adequately monitor what is going on, so the gas companies have little to concern themselves with - the NT Government just seems to 'adjust' the circumstances to suit the gas companies and that absolves them of any responsibility for enforcing particular recommendations. Allowing wet season operations is a totally unsatisfactory response and is a very clear indicator that the recommendations aren't worth the paper they're printed on.

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Privacy:

– Saturday, 18 July 2020 – 11:13:07

Subject	Objection to Imperial Oil and Gas wet season drilling EP187
From	
Sent	7/18/2020 11:13:07 AM

Dear Sir/Madam

With the price of fossil fuels free falling, it might be worthwhile divesting from fossil fuels and rehabilitating your investments to ensure future income and growth.

The answer may be in creating jobs in the community, through easy access education and local learning opportunities. If the government invested in local projects. resourcing (rubbish as a resource), microfactories using 3D printers, food and energy creation. The outcomes for youth who have slipped through the cracks of the education system would be a lot better.

I am hoping that winding down fossil fuels and investing in jobs in the local areas and for Australian farming and mining companies by creating food, energy and micro industry in the local community forms part of government plans. If it doesn't here is some action we can take;

Taking a few minutes to find your local MPs email and copy and paste. A follow up phone call will make the office junior take note. Getting neighbours, friends and family to do the same will mean they will have to change their ways or we can oust them for not following directions.

We just need to take a few minutes to let them know how we would like to be represented.

I am praying for a miracle, complacency is our enemy.

Dear Honorable Members of Parliament,

I hope you will have a look at some of these ideas and seriously consider investing taxpayer funded resources and dollars into supporting Australian owned farms, mines and local areas into planting industrial hemp and developing a plant to product processing (biofuel, 3D Filament and 3D printer (microfactory) mirreco houses).

Given that we are one of the sunniest places on the planet, we now have an unprecedented opportunity to take advantage of this free natural resource. All it takes us a change in mindset and valuing what matters most Clean air, water and environment. These are essential to our survival and our current energy choices are not reflecting their importance.

If investors changed direction and government provided resources (defence forces, experts in the field under employed) to introduce sustainable energy sources Biodigestors, composters, solar and wind generators. and water efficient practices to Australian owned farms and mining operations and suburban areas. It would help people in all areas get back on their feet and reduce operating expenses.

Our current agricultural practices could do with a rethink. Industrial Hemp is a truly versatile textile which has been used to produce and fuel an airplane stronger then steel, build houses, paper, clothes, 3D filament, a superconductor better than graphene and the seed is highly nutritious. 5 to 10 Macadamia nuts a day are good for the heart. Chia and linseed are protein and nutrient rich.

Using regenerative farming practices reduces, water, fertilizer and pest control expense. We should be supplying our defence force and under employed resources to Australian owned farmers and mining operations to help them to change to regenerative farming practices and encouraging nutrient dense, water efficient multifunction plants (eg Hemp over cotton,

maccas over almonds, chia and linseed over rice). Our defence force should be assisting in defence of our food.

Netherlands is the second biggest exporter of food in the world after the US , even though they are one of the smallest nations. This is because they grow everything in green houses which conserve nutrients, water and reduce pests. Solar powered

Hydroponic, aquaponic, vertical superfood production systems should be provided by the government to all Australian owned farms, mining operations and in suburbs. This is where I want my taxpayer dollars to go, what about you?

Check out The BZE million jobs plan launched on Monday (same day one of the largest frackers in the US filed for bankruptcy).

<https://bze.org.au/the-million-jobs-plan/>

Thank you for considering actions for a better future

Best regards

Margaret King

– Monday, 20 July 2020 – 11:37:13

Subject	DENR - Consultation Form - 908332
From	
Sent	7/20/2020 11:37:13 AM

Contact details

First name: Peter
Surname: Robertson
Email address: *****
Country: Australia
Postcode: 0820
Phone number: *****
Stakeholder type: Community

Feedback

Activity you are providing feedback on: Imperial Oil and Gas Pty Ltd (IMP2-5): 2020 Drilling Program NT Exploration Permit (EP) 187 Revised Environment Management Plan

Category type: Social and cultural, Flora and fauna, Water, Waste Management, Climate change, Human health, Chemicals, Regulation and compliance, Well integrity

If other, please specify:: No economic case to develop onshore unconventional gas industry in NT as it will only operate with huge government (public) subsidies and by externalising environmental and impacts and costs.

Comments: The proposal should not be approved because of the following factors: Social and cultural As the Pepper Inquiry stated, there is no social license for fracking in the NT. Flora and fauna Flora and fauna will be adversely impacted through clearing, pollution of air and waterways, noise, and road kill from increased vehicle movements. Water The company cannot guarantee that surface and groundwater will not be polluted by the proposal, both in the short and the long term. Waste Management It is unacceptable to allow open storage of polluted waste water. Climate change The fracking industry consistently and deliberately understates the level of fugitive methane emissions it is responsible for. Methane is a far worse GHG than CO2 and under no circumstances should its release be approved. Human health Communities around the proposal will be affected adversely in a range of ways including increased heavy vehicle movements, noise, air and water pollution, industry employees moving into communities. Chemicals Fracking introduces a range of toxic and untested, potentially toxic chemicals into otherwise uncontaminated water systems. This is not acceptable. Regulation and compliance The recommendations of the Pepper Inquiry have NOT been implemented, e.g. full cost recovery. Well integrity There is no way companies will be held accountable for decades to come for the wells they frack and then abandon. These wells have the potential to contaminate air, land and water systems for decades.

Attachment: TAI_P510-Cooked-with-gas-Darwin-days-over-35C-FINAL.pdf, type application/pdf, 621.6 KB

Attachment 2: TAI_P875-All-its-Fracked-Up-to-Be-WEB.pdf, type application/pdf, 282.5 KB

Attachment 3: Fracking_Methane_latest-US-data-on-fugitive-emissions.pdf, type application/pdf, 211.7 KB

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Attached Documents

GREENHOUSE GASES

Assessment of methane emissions from the U.S. oil and gas supply chain

Ramón A. Alvarez^{1*}, Daniel Zavala-Araiza¹, David R. Lyon¹, David T. Allen², Zachary R. Barkley³, Adam R. Brandt⁴, Kenneth J. Davis³, Scott C. Herndon⁵, Daniel J. Jacob⁶, Anna Karion⁷, Eric A. Kort⁸, Brian K. Lamb⁹, Thomas Lauvaux³, Joannes D. Maasakkers⁶, Anthony J. Marchese¹⁰, Mark Omara¹, Stephen W. Pacala¹¹, Jeff Peischl^{12,13}, Allen L. Robinson¹⁴, Paul B. Shepson¹⁵, Colm Sweeney¹³, Amy Townsend-Small¹⁶, Steven C. Wofsy⁶, Steven P. Hamburg¹

Methane emissions from the U.S. oil and natural gas supply chain were estimated by using ground-based, facility-scale measurements and validated with aircraft observations in areas accounting for ~30% of U.S. gas production. When scaled up nationally, our facility-based estimate of 2015 supply chain emissions is 13 ± 2 teragrams per year, equivalent to 2.3% of gross U.S. gas production. This value is ~60% higher than the U.S. Environmental Protection Agency inventory estimate, likely because existing inventory methods miss emissions released during abnormal operating conditions. Methane emissions of this magnitude, per unit of natural gas consumed, produce radiative forcing over a 20-year time horizon comparable to the CO₂ from natural gas combustion. Substantial emission reductions are feasible through rapid detection of the root causes of high emissions and deployment of less failure-prone systems.

Methane (CH₄) is a potent greenhouse gas, and CH₄ emissions from human activities since preindustrial times are responsible for 0.97 W m⁻² of radiative forcing, as compared to 1.7 W m⁻² for carbon dioxide (CO₂) (1). CH₄ is removed from the atmosphere much more rapidly than CO₂; thus, reducing CH₄ emissions can effectively reduce the near-term rate of warming (2). Sharp growth in U.S. oil and natural gas (O/NG) production beginning around 2005 (3) raised concerns about the climate impacts of increased natural gas use (4, 5). By 2012, disagreement among published estimates of CH₄ emissions from U.S. natural gas operations led to a broad consensus that additional data were needed to better characterize emission rates (4–7). A large body of field measurements made between 2012 and 2016 (table S1) has markedly improved understanding of the sources and magnitude of CH₄ emissions from the industry's operations. Brandt *et al.* summarized the early literature (8); other assessments incorporated elements of recent data (9–11). This work synthesizes recent studies to provide an improved overall assessment of emissions from

the O/NG supply chain, which we define to include all operations associated with O/NG production, processing, and transport (materials and methods, section S1.0) (12).

Measurements of O/NG CH₄ emissions can be classified as either top-down (TD) or bottom-up (BU). TD studies quantify ambient methane enhancements using aircraft, satellites, or tower networks and infer aggregate emissions from all contributing sources across large geographies. TD estimates for nine O/NG production areas have been reported to date (table S2). These areas are distributed across the U.S. (fig. S1) and account for ~33% of natural gas, ~24% of oil production, and ~14% of all wells (13). Areas sampled in TD studies also span the range of hydrocarbon characteristics (predominantly gas, predominantly oil, or mixed), as well as a range of production characteristics such as well productivity and maturity. In contrast, BU studies generate regional, state, or national emission estimates by aggregating and extrapolating measured emissions from individual pieces of equipment, operations, or facilities, using measurements made directly at the emission point or, in the case of facilities, directly downwind.

Recent BU studies have been performed on equipment or facilities that are expected to represent the vast majority of emissions from the O/NG supply chain (table S1). In this work, we integrate the results of recent facility-scale BU studies to estimate CH₄ emissions from the U.S. O/NG supply chain, and then we validate the results using TD studies (materials and methods). The probability distributions of our BU methodology are based on observed facility-level emissions, in contrast to the component-by-component approach used for conventional inventories. We thus capture enhancements pro-

duced by all sources within a facility, including the heavy tail of the distribution. When the BU estimate is developed in this manner, direct comparison of BU and TD estimates of CH₄ emissions in the nine basins for which TD measurements have been reported indicates agreement between methods, within estimated uncertainty ranges (Fig. 1).

Our national BU estimate of total CH₄ emissions in 2015 from the U.S. O/NG supply chain is $13 (+2.1/-1.6, 95\% \text{ confidence interval})$ Tg CH₄/year (Table 1). This estimate of O/NG CH₄ emissions can also be expressed as a production-normalized emission rate of 2.3% (+0.4%/-0.3%) by normalizing by annual gross natural gas production [33 trillion cubic feet (13), with average CH₄ content of 90 volume %]. Roughly 85% of national BU emissions are from production, gathering, and processing sources, which are concentrated in active O/NG production areas.

Our assessment does not update emissions from local distribution and end use of natural gas, owing to insufficient information addressing this portion of the supply chain. However, recent studies suggest that local distribution emissions exceed the current inventory estimate (14–16), and that end-user emissions might also be important. If these findings prove to be representative, overall emissions from the natural gas supply chain would increase relative to the value in Table 1 (materials and methods, section S1.5).

Our BU method and TD measurements yield similar estimates of U.S. O/NG CH₄ emissions in 2015, and both are significantly higher than the corresponding estimate in the U.S. Environmental Protection Agency's Greenhouse Gas Inventory (EPA GHGI) (Table 1 and materials and methods, section S1.3) (17). Discrepancies between TD estimates and the EPA GHGI have been reported previously (8, 18). Our BU estimate is 63% higher than the EPA GHGI, largely due to a more than twofold difference in the production segment (Table 1). The discrepancy in production sector emissions alone is ~4 Tg CH₄/year, an amount larger than the emissions from any other O/NG supply chain segment. Such a large difference cannot be attributed to expected uncertainty in either estimate: The extremal ends of the 95% confidence intervals for each estimate differ by 20% (i.e., ~12 Tg/year for the lower bound of our BU estimate can be compared to ~10 Tg/year for the upper bound of the EPA GHGI estimate).

We believe the reason for such large divergence is that sampling methods underlying conventional inventories systematically underestimate total emissions because they miss high emissions caused by abnormal operating conditions (e.g., malfunctions). Distributions of measured emissions from production sites in BU studies are invariably “tail-heavy,” with large emission rates measured at a small subset of sites at any single point in time (19–22). Consequently, the most likely hypothesis for the difference between the EPA GHGI and BU estimates derived from facility-level measurements is that measurements used to develop GHGI emission factors

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undersample abnormal operating conditions encountered during the BU work. Component-based inventory estimates like the GHGI have been shown to underestimate facility-level emissions (23), probably because of the technical difficulty and safety and liability risks associated with measuring large emissions from, for example, venting tanks such as those observed in aerial surveys (24).

Abnormal conditions causing high CH₄ emissions have been observed in studies across the O/NG supply chain. An analysis of site-scale emission measurements in the Barnett Shale concluded that equipment behaving as designed could not explain the number of high-emitting production sites in the region (23). An extensive aerial infrared camera survey of ~8000 production sites in seven U.S. O/NG basins found that ~4% of surveyed sites had one or more observable high-emission rate plumes (24) (detection threshold of ~3 to 10 kg CH₄/hour was two to seven times higher than mean production site emissions estimated in this work). Emissions released from liquid storage tank hatches and vents represented 90% of these sightings. It appears that abnormal operating conditions must be largely responsible, because the observation frequency was too high to be attributed to routine operations like condensate flashing or liquid unloadings alone (24). All other observations were due to anomalous venting from dehydrators, separators, and flares. Notably, the two largest sources of aggregate emissions in the EPA GHGI—pneumatic controllers and equipment leaks—were never observed from these aerial surveys. Similarly, a national survey of gathering facilities found that emission rates were four times higher at the 20% of facilities where substantial tank venting emissions were observed, as compared to the 80% of facilities without such venting (25). In addition, very large emissions from leaking isolation valves at transmission and storage facilities were quantified by means of downwind measurement but could not be accurately (or safely) measured by on-site methods (26). There is an urgent need to complete equipment-based measurement campaigns that capture these large-emission events, so that their causes are better understood.

In contrast to abnormal operational conditions, alternative explanations such as outdated component emission factors are unlikely to explain the magnitude of the difference between our facility-based BU estimate and the GHGI. First, an equipment-level inventory analogous to the EPA GHGI but updated with recent direct measurements of component emissions (materials and methods, section S1.4) predicts total production emissions that are within ~10% of the EPA GHGI, although the contributions of individual source categories differ significantly (table S3). Second, we consider unlikely an alternative hypothesis that systematically higher emissions during daytime sampling cause a high bias in TD methods (materials and methods, section S1.6). Two other factors may lead to low bias in EPA GHGI and similar inventory

Table 1. Summary of this work's bottom-up estimates of CH₄ emissions from the U.S. oil and natural gas (O/NG) supply chain (95% confidence interval) and comparison to the EPA Greenhouse Gas Inventory (GHGI).

Industry segment	2015 CH ₄ emissions (Tg/year)	
	This work (bottom-up)	EPA GHGI (17)
Production	7.6 (+1.9/−1.6)	3.5
Gathering	2.6 (+0.59/−0.18)	2.3
Processing	0.72 (+0.20/−0.071)	0.44
Transmission and storage	1.8 (+0.35/−0.22)	1.4
Local distribution*	0.44 (+0.51/−0.22)	0.44
Oil refining and transportation*	0.034 (+0.050/−0.008)	0.034
U.S. O/NG total	13 (+2.1/−1.7)	8.1 (+2.1/−1.4) [†]

*This work's emission estimates for these sources are taken directly from the GHGI. The local distribution estimate is expected to be a lower bound on actual emissions and does not include losses downstream of customer meters due to leaks or incomplete combustion (materials and methods, section S1.5).
[†]The GHGI only reports industry-wide uncertainties.

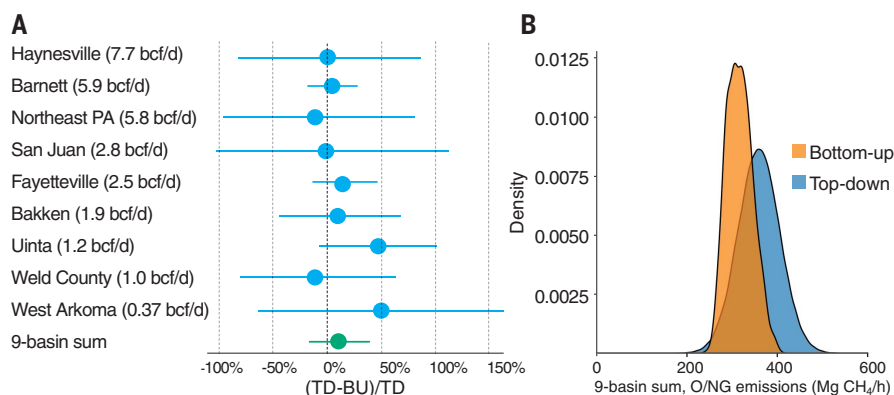


Fig. 1. Comparison of this work's bottom-up (BU) estimates of methane emissions from oil and natural gas (O/NG) sources to top-down (TD) estimates in nine U.S. O/NG production areas. (A) Relative differences of the TD and BU mean emissions, normalized by the TD value, rank ordered by natural gas production in billion cubic feet per day (bcf/d, where 1 bcf = 2.8×10^7 m³). Error bars represent 95% confidence intervals. (B) Distributions of the nine-basin sum of TD and BU mean estimates (blue and orange probability density, respectively). Neither the ensemble of TD-BU pairs (A) nor the nine-basin sum of means (B) are statistically different [$p = 0.13$ by a randomization test, and mean difference of 11% (95% confidence interval of −17 to 41%)].

estimates. Operator cooperation is required to obtain site access for emission measurements (8). Operators with lower-emitting sites are plausibly more likely to cooperate in such studies, and workers are likely to be more careful to avoid errors or fix problems when measurement teams are on site or about to arrive. The potential bias due to this “opt-in” study design is very challenging to determine. We therefore rely primarily on site-level, downwind measurement methods with limited or no operator forewarning to construct our BU estimate. Another possible source of bias is measurement error. It has been suggested that malfunction of a measurement instrument widely used in the O/NG industry contributes to underestimated emissions in inventories (27); however, this cannot explain the more than twofold difference in production emissions (28).

The tail-heavy distribution for many O/NG CH₄ emission sources has important implications for mitigation because it suggests that most sources—whether they represent whole facilities or individual pieces of equipment—can have lower emissions when they operate as designed. We anticipate that significant emissions reductions could be achieved by deploying well-designed emission detection and repair systems that are capable of identifying abnormally operating facilities or equipment. For example, pneumatic controllers and equipment leaks are the largest emission sources in the O/NG production segment exclusive of missing emission sources (38 and 21%, respectively; table S3), with malfunctioning controllers contributing 66% of total pneumatic controller emissions (materials and methods, section S1.4) and equipment leaks 60% higher than the GHGI estimate.

Gathering operations, which transport unprocessed natural gas from production sites to processing plants or transmission pipelines, produce ~20% of total O/NG supply chain CH₄ emissions. Until the publication of recent measurements (29), these emissions were largely unaccounted for by the EPA GHGI. Gas processing, transmission and storage together contribute another ~20% of total O/NG supply chain emissions, most of which come from ~2500 processing and compression facilities.

Our estimate of emissions from the U.S. O/NG supply chain (13 Tg CH₄/year) compares to the EPA estimate of 18 Tg CH₄/year for all other anthropogenic CH₄ sources (17). Natural gas losses are a waste of a limited natural resource (~\$2 billion/year), increase global levels of surface ozone pollution (30), and substantially erode the potential climate benefits of natural gas use. Indeed, our estimate of CH₄ emissions across the supply chain, per unit of gas consumed, results in roughly the same radiative forcing as does the CO₂ from combustion of natural gas over a 20-year time horizon (31% over 100 years). Moreover, the climate impact of 13 Tg CH₄/year over a 20-year time horizon roughly equals that from the annual CO₂ emissions from all U.S. coal-fired power plants operating in 2015 (31% of the impact over a 100-year time horizon) (materials and methods, section S1.7).

We suggest that inventory methods would be improved by including the substantial volume of missing O/NG CH₄ emissions evident from the large body of scientific work now available and synthesized here. Such empirical adjustments based on observed data have been previously used in air quality management (31).

The large spatial and temporal variability in CH₄ emissions for similar equipment and facilities (due to equipment malfunction and other abnormal operating conditions) reinforces the conclusion that substantial emission reductions are feasible. Key aspects of effective mitigation include pairing well-established technologies and best practices for routine emission sources with economically viable systems to rapidly detect the root causes of high emissions arising from abnormal conditions. The latter could involve combinations of current technologies such as on-site leak surveys by company personnel using optical gas imaging (32), deployment of passive sensors at individual facilities (33, 34) or mounted on ground-based work trucks (35), and in situ remote-sensing approaches using

tower networks, aircraft, or satellites (36). Over time, the development of less failure-prone systems would be expected through repeated observation of and further research into common causes of abnormal emissions, followed by re-engineered design of individual components and processes.

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SUPPLEMENTARY MATERIALS

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Materials and Methods
Additional Author Disclosures
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Databases S1 and S2

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Assessment of methane emissions from the U.S. oil and gas supply chain

Ramón A. Alvarez, Daniel Zavala-Araiza, David R. Lyon, David T. Allen, Zachary R. Barkley, Adam R. Brandt, Kenneth J. Davis, Scott C. Herndon, Daniel J. Jacob, Anna Karion, Eric A. Kort, Brian K. Lamb, Thomas Lauvoux, Joannes D. Maasakkers, Anthony J. Marchese, Mark Omara, Stephen W. Pacala, Jeff Peischl, Allen L. Robinson, Paul B. Shepson, Colm Sweeney, Amy Townsend-Small, Steven C. Wofsy and Steven P. Hamburg

Science **361** (6398), 186-188.

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A leaky endeavor

Considerable amounts of the greenhouse gas methane leak from the U.S. oil and natural gas supply chain. Alvarez *et al.* reassessed the magnitude of this leakage and found that in 2015, supply chain emissions were ~60% higher than the U.S. Environmental Protection Agency inventory estimate. They suggest that this discrepancy exists because current inventory methods miss emissions that occur during abnormal operating conditions. These data, and the methodology used to obtain them, could improve and verify international inventories of greenhouse gases and provide a better understanding of mitigation efforts outlined by the Paris Agreement.

Science, this issue p. 186

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Cooked with gas

Extreme heat in Darwin

The number of days over 35°C in Darwin has increased from 5.6 per year to 22.2 per year. CSIRO modelling estimates that without climate action this could rise to 132 days per year in 2030 and 275 days per year in 2070. Such extreme heat would have profound effects on human health, industries and ecosystems. Given the NT's vulnerability to climate change, development of emission-intensive oil and gas reserves are not in the Territory's interests.

Dr Elizabeth Hanna

Mark Ogge

March 2018

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Summary

Temperatures above 35°C with 70% humidity are considered ‘extremely dangerous’ by government agencies such as the US Government National Oceanic and Atmospheric Administration. The number of days over 35°C per year in Darwin has increased fourfold from an average of 5.6 days per year in the early 20th century to over 20 days per year in the last five years.

This increase is especially pronounced throughout the September to December “build-up” to the wet season. Combined with the humidity of this season, the resultant heat stress risk is being pushed to an extremely dangerous level.

Alarming, CSIRO climate models project that without drastic reductions in greenhouse gas emissions, the number of days over 35 degrees each year in Darwin will increase dramatically to 132 days per year by 2030, 187 days per year by 2050 and 275 days per year by 2070.

Temperature increases of this magnitude are dangerous. Severe health impacts and heat-related deaths would increase. Increased hot days would reduce productivity in important Territory industries such as agriculture, construction and tourism. Ecosystems would be severely damaged and the standard of living of all Territorians would be greatly reduced.

Exploiting shale oil and gas in the Territory is completely incompatible with the steps we need to avoid these impacts.

Introduction

Extreme heat is dangerous for human health, for ecosystems and agriculture. As the climate warms, the number of extremely hot days is forecast to increase. While Darwin is known for its consistent warm weather, the number of extremely hot days - days over 35°C - has generally been low. The number of extremely hot days in Darwin has increased through the last century and is forecast to increase dramatically without a strong policy response to climate change.

Animals and plants have an upper limit for heat tolerance. While flora and fauna in the tropics are adapted for the relatively high temperatures of their environment, the temperature ranges they experience in tropical regions are very narrow compared to temperate climate zones. Tropical flora and fauna struggle to survive temperatures outside the range they are accustomed to, such as extreme heat.¹

The human body copes with a wider temperature range via complex thermoregulatory system. In hot climates, the body cools itself primarily through sweating.² Evaporation of sweat transfers heat from the body to the atmosphere. However, when the surrounding air is hot and humid, heat loss stalls, and the body temperature rises. This creates discomfort and further heat gain brings a cascade of health impacts, from mild to severe, and can ultimately be fatal without intervention. Familiarity with heat allows the body to acclimatize, but this too has upper limits.³

Temperature and humidity are often combined into a heat index figure to provide a simple indicator of the body's ability to cool itself. Of a number of indices available, one of the most important is published by the US Government National Oceanic and Atmospheric Administration (NOAA).

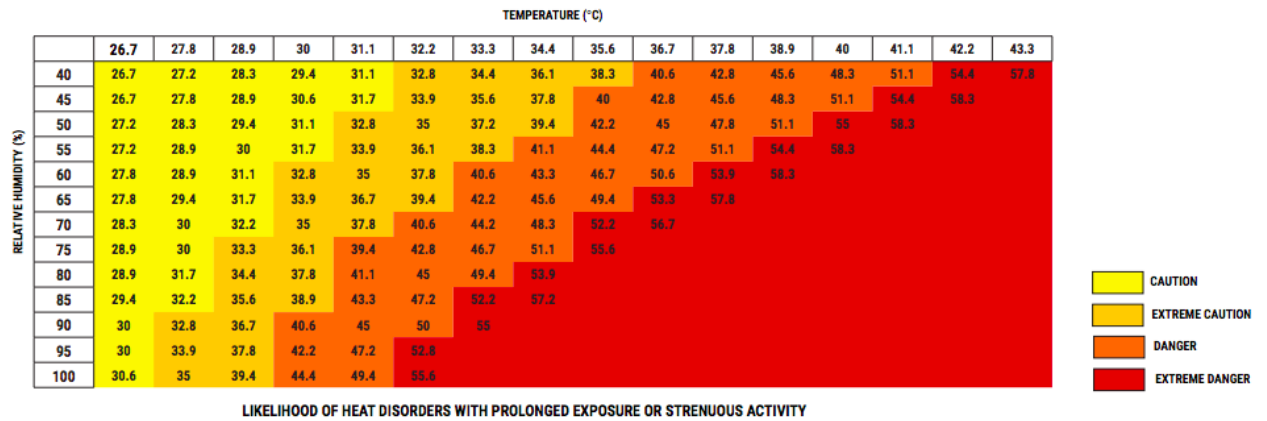
As shown in the NOAA heat stress chart in Figure 1 below, the combination of centigrade temperatures in the low thirties with high humidity are considered "dangerous" to human health.

¹ Khaliq I, Hof C, Prinzinger R, Bohning-Gaese K, Pfenninger M. (2014) Global variation in thermal tolerances and vulnerability of endotherms to climate change. *Proc Biol Sci.* 2014; 281 (1789): 20141097.

² Hanna EG, Tait PW. Limitations to thermoregulation and acclimatisation challenges human adaptation to global warming. *Int J Environ Res Public Health* (2015) ; 12 (7): 8034-74.

³ Hanna EG, Tait PW. Limitations to thermoregulation and acclimatisation challenges human adaptation to global warming (2015) *Int J Environ Res Public Health* 2015; 12 (7): 8034-74.

Figure 1. NOAA Heat Stress Index



Source: http://www.nws.noaa.gov/os/heat/heat_index.shtml

As shown in Figure 1, NOAA’s heat stress index rises to “Extreme Danger” when temperatures pass 35°C with 70% humidity. Darwin’s current climate already sees relative humidity levels approach and even exceeds 70%. From March 2017 to February 2018 there were 60 days with a relative humidity of 70% or above at 3pm in Darwin. 46 of these days occurred during the months of January, February and March.⁴

A future that combines such high humidity levels with a large increase in days over 35 degrees represents a serious threat to the wellbeing of Darwin’s population. Under such conditions even short period of exposure, particularly in combination physical exertion, can lead to serious heat disorders and even the risk of death.

Heat stress indices inform the International Standards Organization guidelines for work-rest ratios to limit the risk of overheating and avoid deaths⁵. Temperatures are recorded in the shade, so the additional heat generated by sunlight adds further to the risk. According to these guidelines, gentle exercise, such as walking in the sun at 3pm in Darwin for more than 15 minutes per hour, from September to December (during the build-up season) already presents dangerous risks of heat stress.⁶

Projections about future humidity are mixed. Humidity levels are projected to remain largely unchanged in the Monsoonal North West of Australia up to 3 degrees of warming. Over 3 degrees there is thought to be a 34% chance of a small decrease in

⁴ BOM Daily Weather Observations. <http://www.bom.gov.au/climate/dwo/IDCJDW8014.latest.shtml>

⁵ ISO / DIS 7243. Ergonomics of the thermal environment -- Assessment of heat stress using the WBGT (wet bulb globe temperature) index. Geneva: International Standards Organization; 2015 18th June .p. 16. Available from: http://www.iso.org/iso/home/store/catalogue_ics/catalogue_detail_ics.htm?csnumber=67188. [cited 30th July 2016].

⁶ Davis C, Hanna (2016) EG. Temperature and rainfall trends in Northern Australia 1911-2013: implications for human activity and regional development. Climate Research. 2016; 71 (1): 1-16.

humidity (-1 to -10%).⁷ However, warm air can hold more water vapour, an extra 7% for every 1°C.⁸ In a warming world people's ability to regulate temperature through sweating may be hampered.

⁷ CSIRO Climate Change in Australia, Climate Futures Tool, RCP 8.5, 2017. Accessed 15/3/18, <https://www.climatechangeinaustralia.gov.au/en/climate-projections/climate-futures-tool/projections/>

⁸ Coumou D, Rahmstorf S. A decade of weather extremes. *Nature Clim Change*. 2012; 2 (EPub 25 March): 491–6.

Increasing temperatures in the Top End

Bureau of Meteorology temperature records are available for Darwin from 1911. On average there were 5.6 days per year over 35°C for the 30-year period from 1911 to 1940. This almost doubled to 10.1 days per year for the years between 1961 and 1990, as shown in Table 1 below:

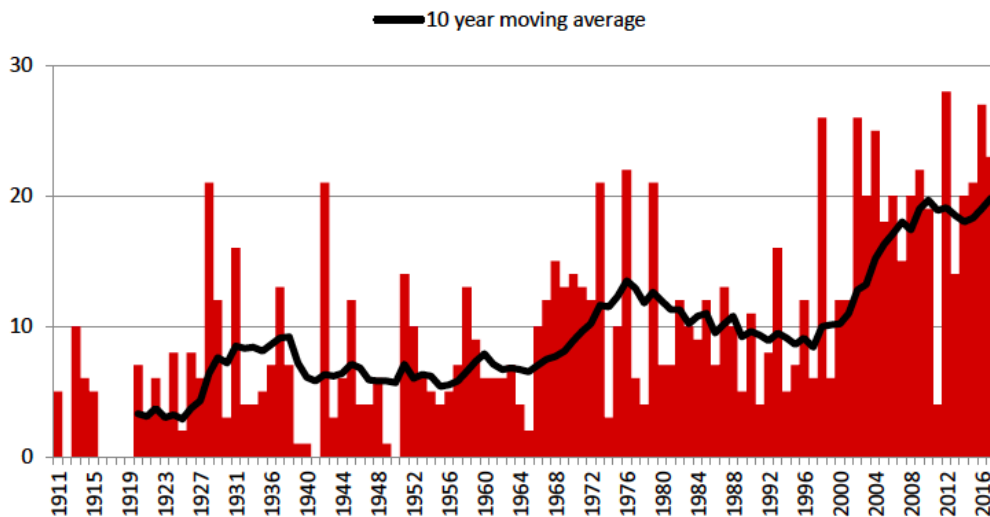
Table 1: Average number of days per year above 35°C, Darwin

Year	Average days over 35°C
1911-1940	5.6
1961-1990	10.1
2008-2017	19.8
2012-2017	22.2

Source: Bureau of Meteorology <http://www.bom.gov.au/climate/data/index.shtml>

As shown in Table 1 above, the 10 years to 2017 have seen days over 35°C double again to 19.8 days per year. Since 2012, the maximum daily temperature has reached 35°C on average over 22 days per year, representing a fourfold increase since the first half of the 20th century. The Bureau of Meteorology data back to 1911 is represented in Figure 2 below:

Figure 2: Annual number of days over 35°C Darwin, 1911-2016



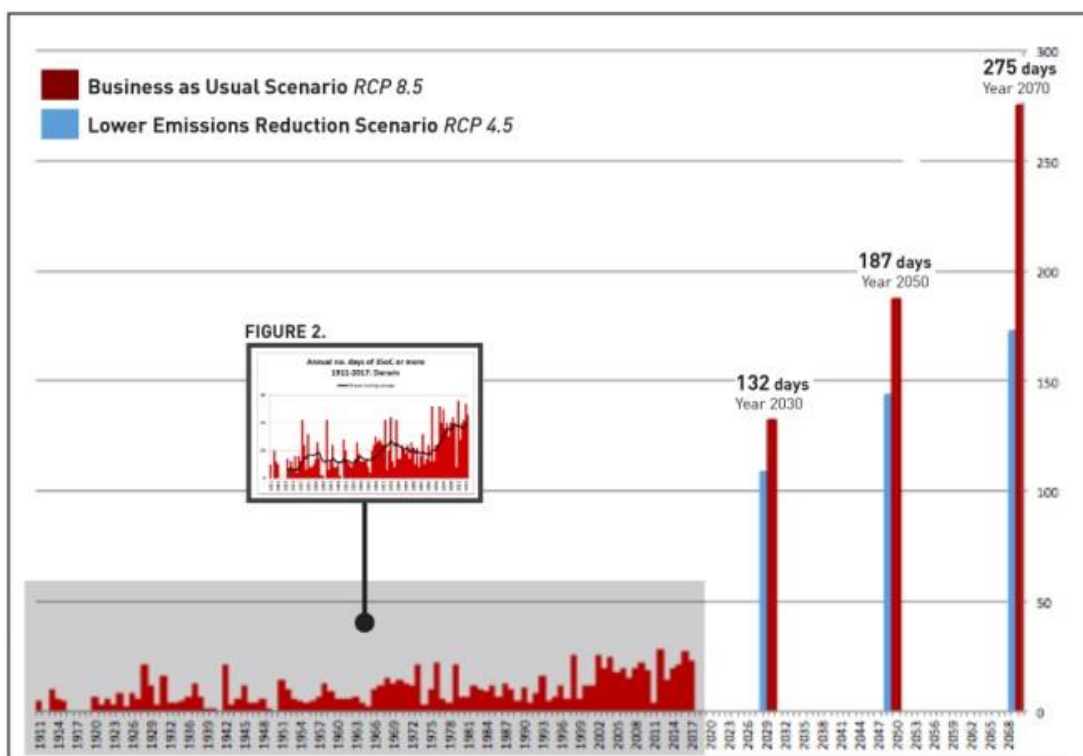
Source: Analyzed by C. Davis from BoM Acorn_Sat data set.

This recent increase in very hot days has significant implications for human health, productivity and the quality of life of people living in Darwin. Furthermore, the projected increase over the following decades will significantly exacerbate these challenges.

Projected increases in days over 35°C

The number of extremely hot days in Darwin will increase dramatically in the coming decades under CSIRO climate modelling. Under a business as usual scenario on greenhouse emissions, the CSIRO estimates Darwin could experience days 132 days over 35°C per year in 2030, 187 days per year by 2050 and 275 days per year in 2070. Figure 3 below combines the Bureau of Meteorology’s data on days over 35°C from 1911 with CSIRO predictions out to 2070:

Figure 3: Darwin days over 35°C per year historic and CSIRO future modelling



Source: CSIRO Climate Change in Australia, Climate Thresholds Calculator. Using HadGEM2 RCP 8.5. Accessed 13/3/18 <https://www.climatechangeinaustralia.gov.au/en/climate-projections/explore-data/threshold-calculator/#>

These projections are based on the IPCC Representative Concentration Pathways (RCPs) which are scenarios of various levels of concentrations of greenhouse gases in the atmosphere. Here we have used RCP 8.5, which is the highest of the four scenarios of global emissions outlined by the IPCC in their 2014 Fifth Assessment. It reflects the Business as Usual (BAU) scenario, which most closely resembles the current global trajectory as emissions still continue to increase⁹.

⁹ Le Quere C, Andrew RM, Friedlingstein P, Sitch S, Pongratz J, Manning AC, et al. Global carbon budget 2017. Earth Syst Sci Data. 2017; 8 (13 November): 605–49.

Figure 3 also shows the projected number of hot days using the RCP 4.5 scenario where strong emission reduction is achieved. The RCP 4.5 pathway requires decisive reduction in emissions. If this is achieved, the CSIRO expects number of days over 35°C per year for Darwin to be significantly lower than in BAU trajectory, with 108 days over 35°C per year in 2030, 143 days per year in 2040 and 178 days per year in 2070. While these figures carry significant inherent risk, substantial additional harm could be avoided.

The number of days per year over 35°C under the most ambitious scenario (RCP 2.6) is not shown in Figure 3 as the CSIRO no longer provides these projections. Limiting warming to below 2°C is still possible but would require rapid reductions and deep and profound decarbonization of the global economies⁽²⁾.¹⁰ Insufficient political appetite has been shown thus far to achieve this goal as agreed in Paris in 2015.¹¹ However, it is the only way the Northern Territory can avoid the devastating impacts of dangerous climate change.

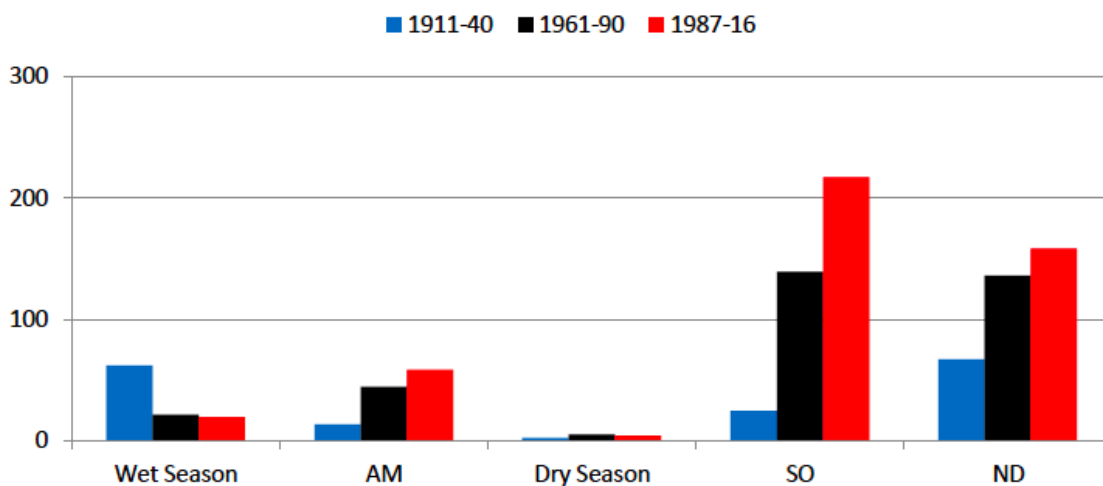
¹⁰ Raftery AE, Zimmer A, Frierson DMW, Startz R, Liu P. (2017) Less than 2 °C warming by 2100 unlikely. *Nature Climate Change*. 2017; 7: 637.

¹¹ UNEP. The Emissions Gap Report 2017. A UN Environment Synthesis Report. Nairobi: United Nations Environment Programme (UNEP); 2017 31st October p. 116. Available from: https://wedocs.unep.org/bitstream/handle/20.500.11822/22070/EGR_2017.pdf?sequence=1&isAllowed=y. [cited 1st November 2017].

Distribution of extreme heat days

An indication of the likely timing of extreme heat days throughout the year can be gained from examining trends from 1911 over the various seasons. As shown in Figure 4, the increase in days over 35°C per year is concentrated in the shoulder seasons, the “build-up” to the wet season and the transition from the wet to the dry.¹² The high humidity of these seasons combined with the significant increase in extreme heat days already occurring make this period already dangerous to human health and wellbeing.

Figure 4: Distribution of days over 35°C by season



Note: AM=April-May, SO= Sept-Oct, ND= Nov-Dec. Source: Analyzed by C. Davis from BoM Acorn_Sat data set.

Note, in Figure 4, the number of days refers to the total over the time period represented, not the annual average.

Further increase in days over 35 severely increase these impacts. Extreme heat days can also be expected to increase in other seasons as the total number of extreme heat days exceeds the amount of days currently making up the shoulder seasons.

¹² Davis C, Hanna EG. Temperature and rainfall trends in Northern Australia 1911-2013: implications for human activity and regional development. *Climate Research*. 2016; 71 (1): 1-16.

Consequences of increases in extreme heat days

There will be a range of consequences from more frequent days of extreme heat, including increased intensity of storms, increasing rainfall extremes, changes to mosquito populations and the way infectious diseases spread.

Severe impacts on human health would result, including increased rates of heat-related deaths. Heat interrupts sleep patterns and reduces capacity and willingness to exercise. Both carry broad ramifications, such as increased accident risk,¹³ avoidance of general life tasks, for example cooking healthy foods, and sedentary life style induced diabetes and cardio vascular disease.¹⁴ Europe, Russia, India and Pakistan have all experienced heat waves resulting in mass death events where thousands of people died sitting in their homes.^{15,16}

Irritability also increases with heat. Darwin experiences strong seasonal patterning in domestic violence and assaults which peak during the build-up season.¹⁷ Exacerbations of these incidences would have far reaching effects. The trauma is shocking for victims and their families, and spikes in these violent attacks stretches response capacity of hospital and police services. They also have profoundly negative bearing on social amenity by disrupting community cohesion, sense of safety and attractiveness to visitors and tourists.

Recent analysis of decadal climate systems suggests it is possible that the world could breach 1.5°C warming as early as 2026.¹⁸ If this happens, within the next decade, Darwin is likely to witness increasingly severe impacts on human health and many more heat related deaths. The ability of the human body to continue to be physically active throughout the day time, for 6 or more months of the year will be significantly curtailed.

Later this decade, the number of highly dangerous months could extend to 8 or 9. Many industries such as tourism, construction and agriculture would face challenges just to continue

¹³ Kjellstrom T, Kovats RS, Lloyd SJ, Holt T, Tol RSJ. The Direct Impact of Climate Change on Regional Labor Productivity. *Archives of Environmental & Occupational Health*. 2009; 64 (4): 217-27.

¹⁴ WHO. Preventing noncommunicable diseases (NCDs) by reducing environmental risk factors. Geneva; 2017.p. 16. Report No.: WHO/FWC/EPE/17.1. Available from: <http://apps.who.int/iris/bitstream/10665/258796/1/WHO-FWC-EPE-17.01-eng.pdf?ua=1>. [cited 26th September 2017].

¹⁵ Wang H, Horten R. Tackling climate change: the greatest opportunity for health *The Lancet Climate Change and Human Health Commission*. 2015;DOI: [http://dx.doi.org/10.1016/S0140-6736\(15\)60854-6](http://dx.doi.org/10.1016/S0140-6736(15)60854-6)(June): 1-2.

¹⁶ Hass A, Ellis K, Reyes Mason L, Hathaway J, Howe D. Heat and Humidity in the City: Neighborhood Heat Index Variability in a Mid-Sized City in the Southeastern United States. *International Journal of Environmental Research and Public Health*. 2016; 13 (1): 117.

¹⁷ Purtill J. Mango madness: Tropical seasonal affective disorder linked to stress and depression, research finds Melbourne: ABC News; 2014 [updated 9 Oct Available from: <http://www.abc.net.au/news/2014-10-07/mango-madness-mental-illness-tropical-wet-season-build-up/5795852>

¹⁸ Henley BJ, King AD. (2017) Trajectories toward the 1.5°C Paris target: Modulation by the Interdecadal Pacific Oscillation. *Geophysical Research Letters*. 2017; 44 (9): 4256–62

operating. In those industries productivity would be impacted, as work-rest ratios will impinge on financial viability. Alternative strategies to facilitate sustained physical exertion outdoors, such as cooling vests and cool rooms will add to costs but are likely to be a necessary feature across Australia's tropical north.

Conclusion

Given the vulnerability of Darwin and the rest of the Northern Territory to climate change, further development of its fossil fuel resources is not in the Territory's interests. Such development is incompatible with Australia's carbon budget and commitments under the Paris agreement to limit warming to less than 2 degrees. It has been calculated that two thirds of **existing** fossil fuel reserves need to remain in the ground in order to have even a 50% avoid 2 degrees warming.¹⁹

Despite this, the Draft Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory examines a gas production scenario that could result in an increase of 5% of Australia's national emissions. A submission from the Northern Territory Department of Primary Industries and Resources presents an oil and gas production scenario that would represent an increase of over 20% of Australia's total annual emissions. Incredibly, the draft report lists the consequences of these changes in emissions as "low" and the risk as "medium".²⁰

Darwin residents are already experiencing the consequences of global warming. Northern Territory shale oil and gas is a very large potential source of carbon emissions which should not be developed.

¹⁹ McGlade and Ekins (2015) The geographical distribution of fossil fuels unused when limiting global warming to 2 °C, accessed 15/3/18, <https://www.nature.com/articles/nature14016>

²⁰ Scientific Inquiry into Hydraulic Fracturing in the Northern Territory (2017) *Draft Final Report*, <https://frackinginquiry.nt.gov.au/inquiry-reports/draft-final-report>

All It's Fracked Up to Be

Government documents released under FOI show annual emissions from fracking for gas in the NT could be as large as 22% of Australia's current annual emissions, larger than from all coal stations expected to be then running in the NEM, and require more offsets every year than have ever been issued in Australia to date.

**Tom Swann
February 2020**

The NT's Scientific Inquiry into Hydraulic Fracturing found that fracking for gas in the NT threatens greenhouse gas emissions on a very large scale and would cause climate impacts that would be "unacceptable". It found that fracking should not be allowed unless all lifecycle emissions, including combustion of the gas, are fully offset. The NT Government accepted this recommendation. It removed the moratorium on fracking for gas, on the condition that all emissions should be offset.

Documents released under Freedom of Information (FOI) show NT and Commonwealth officials warning that emissions from NT fracking could threaten Australia's ability to meet international obligations. They reiterated the need to stop the projects if offsetting does not occur.¹ The documents support Australia Institute research showing the scale of potential NT fracking emissions.

In the released documents, officials state that emissions from fracking (direct and from burning the gas) could reach 39 million tonnes of carbon dioxide equivalent (MtCO₂e) per year under one production scenario, and up to 117 MtCO₂e per year under larger scale production.

¹ Bardon (2020) *How fracking could threaten Australia's Paris target*
<https://www.abc.net.au/radionational/programs/backgroundbriefing/fracking-could-threaten-australias-paris-target/12006532> Documents on FOI disclosure log, references 191111, 191110,
<http://www.environment.gov.au/about-us/freedom-information/foi-disclosure-log>,

To put in context the vast scale of these emissions, this is **7% to 22% of Australia's current domestic emissions** (532 Mt CO₂e year to June 2019).²

At their peak, NT fracking emissions would be:

- comparable to annual emissions from all currently operating coal power stations in the NEM (144 MtCO₂e).³
- larger than annual emissions all currently operating black coal power stations (101 MtCO₂e) and,
- larger than annual emissions from **all coal fired power stations in the National Electricity Market (NEM)** expected to be operating in the NEM when fracking occurs (estimated at 107 MtCO₂e),

The smaller fracking emissions figure is comparable **to annual emissions from all the old brown coal fired generators in Victoria** (estimated at 43 MtCO₂e).⁴

The offsets required to offset NT fracking lifecycle emissions under the larger production scenario would be larger **every year than all Australian Carbon Credit Units (ACCUs) ever issued by the Australian Government** (74 MtCO₂e).⁵

At the smaller figure, annual offsets required **four times the offsets delivered each year under the Emissions Reduction Fund** (historically ~10 MtCO₂e per year).⁶

STILL NO OFFSETS POLICY

Nearly two years after the Fracking Inquiry issued its final report, there is still no credible offsets policy. The NT Government plans to have such a policy in place by the end of 2021. In the meantime, the NT Government has approved numerous fracking exploration operations with significant emissions but no offsets, a substantive breach of its commitment.

² Department of the Environment (2020) *Quarterly Update of Australia's National Greenhouse Gas Inventory: June 2019* <http://www.environment.gov.au/climate-change/climate-science-data/greenhouse-gas-measurement/publications/quarterly-update-australias-nggi-jun-2019>

³ These calculations are set out in an appendix.

⁴ These calculations are set out in an appendix.

⁵ CER (2020) *ERF Projects* <http://www.cleanenergyregulator.gov.au/maps/Pages/erf-projects/index.html>

⁶ CER (2020) <http://www.cleanenergyregulator.gov.au/ERF/project-and-contracts-registers/carbon-abatement-contract-register>

A recent 'Offsets Policy' document put out by the NT Government gives no further clarity. The Australia Institute's submission regarding the Offsets Policy (attached in an appendix) recommends the policy be amended so that:

- 1. fracking companies will be required to provide offsets for all domestic scope 1, 2 and 3 emissions, as recommended by the Fracking Inquiry;**
- 2. only ACCUs will be accepted as allowed offsets;**
- 3. the fracking companies pays for these offsets, not the NT Government; and**
- 4. the NT Government maximise benefits accruing to the NT by allowing mandatory minimum requirements for offsets based in the NT.**

Given the NT Government's decision to allow fracking, the commitment to require full offsetting is by far the single most important thing the NT Government has promised to do on climate change – and this is required *simply to stop emissions from increasing*.

While offsetting is a NT government commitment, the Commonwealth has already agreed to assist with implementation. The Commonwealth should ensure the offsetting policy is rigorous and secured *prior* to any further fracking. As the FOI documents confirm, failure to offset threatens international obligations to further reduce emissions.

APPENDIX 1: CALCULATION OF COAL EMISSIONS

No data set was found outlining emissions from Australian coal fired power stations.

The list of NEM power stations, their nameplate capacity (MW) and emissions factors (tCO₂e / MWh) were sourced from AEMO.⁷

This was used to derive emissions assuming all power stations were running all year at full capacity.

Actual generation for 2017-18 for brown coal and for black coal in relevant NEM states (NSW, Victoria, Queensland) was sourced from the Australian Energy Statistics.⁸

This was used to derive the capacity factors (% of maximum generation) for black and brown coal power stations on the NEM.

This in turn was used to estimate actual emissions from black and brown coal generators.

Power stations were then removed if they are due to close by 2030, according to the Australian Energy Council, the peak lobby group for power generators.⁹

Table 1: Emissions estimates for NEM coal power stations

	Total	brown coal	black coal
Capacity MW	23,109	4,690	18,419
hours in year	8,766		
MWh at 100%	202,573,494	41,112,540	161,460,954
Actual generation '17-18		36,008,406	110,670,439
capacity factor		88%	69%
tCO ₂ e at 100% capacity	196,385,712	49,295,048	147,090,664
Mt tCO ₂ e at actual capacity	144	43.2	100.8
Mt CO ₂ e at actual capacity, expected operating 2030	107	37.8	69.1

Source: described above

⁷ AEMO (2020) *Carbon Dioxide Equivalent Intensity Index*

<https://aemo.com.au/en/energy-systems/electricity/national-electricity-market-nem/market-operations/settlements-and-payments/settlements/carbon-dioxide-equivalent-intensity-index>

⁸ Department of Energy (2019) *Australian Energy Update 2019* - Table O

<https://www.energy.gov.au/publications/australian-energy-update-2019>

⁹ AEC (2019) *Where do we need a new dispatchable power station*

<https://www.energycouncil.com.au/analysis/where-do-we-need-a-new-dispatchable-power-station/>

APPENDIX 2: SUBMISSION RE NT OFFSET POLICY

21 February 2020

To Whom it Concerns,

The Australia Institute welcomes the opportunity to make this submission regarding the NT Government's Draft Offsets Policy. Our comments relate specifically to offsets for greenhouse gases (GHG). We have attached a previous submission to the NT Climate Policy consultation as it remains directly relevant to this policy.¹⁰

The NT's Scientific Inquiry into Hydraulic Fracturing found the GHG emissions from fracking would cause climate impacts that would be "unacceptable" and so that it should not be allowed unless all lifecycle emissions, including domestic combustion of the gas, are fully offset.

The NT Government accepted this recommendation.

In light of this, the NT Offsets Policy should be revised so that

- 1. it confirms that fracking companies will be required to provide offsets for all domestic scope 1, 2 and 3 emissions, as recommended by the Fracking Inquiry,**
- 2. only ACCUs will be accepted as allowed offsets,**
- 3. the fracking companies will pay for these offsets, not the NT Government, and**
- 4. the NT Government can maximise benefits accruing to the NT by allowing mandatory minimum requires for offsets to be delivered from projects based in the NT.**

Given the NT Government's decision to allow fracking, the commitment to require full offsetting is by far the single most important thing the NT Government has promised to do on climate change – and this is required simply to stop emissions from increasing.

To be clear the scale of emissions from one field would be many times greater than proposed emissions savings from the NT government's 50% renewable energy target.

The NT Government has a laudable 2050 target of net zero emissions and it is encouraging to see actions towards that goal. However if the fracking offset requirement is not implemented in rigorous way, upfront and in full, then it will make it virtually impossible for the NT to make progress towards that goal.

It is deeply concerning that the NT Government has put off resolving the substance of this commitment until the end of 2021, after which point the fracking industry will have begun substantial operations.

¹⁰ Online: Swann (2018) *Getting Offset* <https://www.tai.org.au/content/getting-offset-submission-re-nt-climate-change-discussion-paper>

The risk of broken promises and backsliding is clear. Indeed in the meantime, the NT Government has approved a number of exploration fracking operations, allowing additional GHG emissions without any offsetting required, a breach of the commitment to require full offsetting of all emissions from fracking.

The offsets policy contains entirely laudable general principles regarding the use of offsets. But it gives little clarity regarding how offsets will be required.

This can and should be resolved very quickly.

As per the clear recommendation of the Fracking Inquiry, all domestic scope 1, 2 and 3 emissions should be offset. These are easy to calculate from Commonwealth government emissions factors.

(Note the scope 1 factors for fugitives are problematically low, with new research frequently demonstrating high fugitive methane emissions are not properly accounted for. But the existence of national factors nonetheless allows easy calculation.)

The offsets required should be credible, certified under the National Carbon Offsets Scheme as Accredited Carbon Credit Units (ACCUs). Methodologies for accrediting ACCUs are developed and approved by a statutory Commonwealth agency. Gas companies, or indeed the NT government, can apply to have new methods considered.

The draft Offsets policy only mentions ACCUs and does not mention other, less credible forms of offsets. This is welcome and suggests that the NT government will only allow ACCUs.

However the suggestion is not a clear commitment. This is easily fixed. The policy should state that only ACCUs will be accepted.

The NT Government could readily impose a minimum mandated requirement for a share of ACCUs sourced from activities in the NT.

All of these proposed revisions to the NT Draft Offsets policy represent the existing substantive commitment of the NT Government and are easily implemented within existing federal government carbon governance frameworks.

For the NT Government not to make such revisions, or to make them explicit in some other policy document, will only further heighten concerns about the NT Government's commitment to this very important policy commitment.

We would welcome the opportunity to discuss further with the Department.

Sincerely,

Tom Swann
Senior Researcher
The Australia Institute

Abela, D – Friday, 24 July 2020 – 17:51:09

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	D Abela
Sent	7/24/2020 5:51:09 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

D Abela

Nightcliff, Northern Territory, 0810, Australia

This email was sent by D Abela via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however D provided an email address (*****) which we included in the REPLY-TO field.

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ALBRECHT, Heather – Thursday, 23 July 2020 – 12:15:12

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Heather ALBRECHT
Sent	7/23/2020 12:15:12 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Heather ALBRECHT

Minyama, Queensland, 4575, Australia

This email was sent by Heather ALBRECHT via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Heather provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Heather ALBRECHT at *****.

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Alderman, Daniel – Saturday, 25 July 2020 – 16:54:49

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Daniel Alderman
Sent	7/25/2020 4:54:49 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

Yours sincerely,

***** Alderman

Darwin City, Northern Territory, 0800, Australia

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Please reply to Daniel Alderman at *****.

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Alexander, Ashok – Friday, 31 July 2020 – 13:25:31

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Ashok Alexander
Sent	7/31/2020 1:25:31 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Yours sincerely,

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Ambler, Susan – Monday, 20 July 2020 – 22:27:19

Subject	Objection Imperial Oil and Gas wet season drilling program EP 187
From	Susan Ambler
Sent	7/20/2020 10:27:19 PM

Dear Department of Environment and Natural Resources,

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DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Susan Ambler

• Katoomba DC, New South Wales, 2780, Australia

This email was sent by Susan Ambler via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Susan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Susan Ambler at *****.

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Ambridge, Samantha – Tuesday, 28 July 2020 – 14:25:25

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Samantha Ambridge
Sent	7/28/2020 2:25:25 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Samantha Ambridge

Virginia, Northern Territory, 0834, Australia

This email was sent by Samantha Ambridge via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Samantha provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Samantha Ambridge at *****.

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AmorRobertson, Jordan – Monday, 20 July 2020 – 12:21:07

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jordan Amor-Robertson
Sent	7/20/2020 12:21:07 PM

Dear Department of Environment and Natural Resources,

There is no future in fracking. In addition to the significant environmental concerns, it is increasingly clear that this is not a financially sustainable endeavour. The future is in renewables.

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Light pollution due to artificial lighting required for safe operations,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water

and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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Thank you for considering my concerns,

Yours sincerely,

Jordan Amor-Robertson

Nightcliff, Northern Territory, 0810, Australia

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Armstrong, Valerie – Friday, 24 July 2020 – 11:29:55

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Valerie Armstrong
Sent	7/24/2020 11:29:55 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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Thank you for considering my concerns,

Yours sincerely,

Valerie Armstrong

Longwarry North, Victoria, 3816, Australia

This email was sent by Valerie Armstrong via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Valerie provided an email address (*****) which we included in the REPLY-TO field.

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Arthur, Kylie – Thursday, 30 July 2020 – 11:53:43

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kylie Arthur
Sent	7/30/2020 11:53:43 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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TRANSPORT RISKS AND TOURISM IMPACTS

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Kylie Arthur

Darwin City, Northern Territory, 0800, Australia

This email was sent by Kylie Arthur via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Kylie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Kylie Arthur at *****.

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Asmar, Soraya – Tuesday, 28 July 2020 – 21:31:12

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Soraya Asmar
Sent	7/28/2020 9:31:12 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Soraya Asmar

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Please reply to Soraya Asmar at *****.

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Asplin, Jennifer – Monday, 20 July 2020 – 16:18:34

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jennifer Asplin
Sent	7/20/2020 4:18:34 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Increased intensity of flooding from land clearing and drilling activities,
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- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

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IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

jennifer asplin

New South Wales, 2540, Australia

This email was sent by jennifer asplin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however jennifer provided an email address (*****) which we included in the REPLY-TO field.

Please reply to jennifer asplin at *****.

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Atkinson, Max – Thursday, 30 July 2020 – 19:08:00

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Max Atkinson
Sent	7/30/2020 7:08:00 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Max Atkinson

Millner, Northern Territory, 0810, Australia

This email was sent by Max Atkinson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Max provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Max Atkinson at *****.

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Barbour, Georgina – Tuesday, 28 July 2020 – 19:17:57

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Georgina Barbour
Sent	7/28/2020 7:17:57 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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Thank you for considering my concerns,

Yours sincerely,

Georgina Barbour

Berry Springs, Northern Territory, 0838, Australia

This email was sent by Georgina Barbour via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Georgina provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Georgina Barbour at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Beaux, Pippa – Tuesday, 28 July 2020 – 13:51:43

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Pippa De Beaux
Sent	7/28/2020 1:51:43 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

14 million acres is a lot of wells. A lot of wells intercepting gas horizons and aquifers. Wells that will exist forever. With "no specific considerations" for how these will be rehabilitated or maintained forever and a change of hand after 3 years, who will take responsibility for when the aquifers become polluted? American companies? Is there anything they can realistically do once a well fails to reverse the environmental damage it's caused?

And who's name will be on the document approving this to go ahead? With a global oversupply of gas and lower demand due to global economic downturn the time for closure and rehabilitation may come sooner than Imperial would like. Even with short memories I'm sure we will recall who gave fracking the go ahead in the NT and who failed in their duties to protect the NT environment.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Disturbance to heritage sites due to works conducted out of the approved areas.
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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

**USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON
POSES AN UNACCEPTABLE RISK**

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.

- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Pippa De Beaux

This email was sent by Pippa De Beaux via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Pippa provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Pippa De Beaux at *****.

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Beck, Joy – Monday, 20 July 2020 – 12:02:20

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Joy Beck
Sent	7/20/2020 12:02:20 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

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Thank you for considering my concerns,

Yours sincerely,

Joy Beck

Howard Springs, Northern Territory, 0835, Australia

This email was sent by Joy Beck via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Joy provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Joy Beck at *****.

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Blake, Kim – Friday, 24 July 2020 – 08:12:54

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kim Blake
Sent	7/24/2020 8:12:54 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Kim Blake

South Melbourne, Victoria, 3205, Australia

This email was sent by Kim Blake via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Kim provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Kim Blake at *****.

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Boer, Kate – Friday, 31 July 2020 – 14:38:19

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kate De Boer
Sent	7/31/2020 2:38:19 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Yours sincerely,

Kate de Boer

Mount Helena, Western Australia, 6082, Australia

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Bollard, Tony – Thursday, 30 July 2020 – 17:16:18

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Tony Bollard
Sent	7/30/2020 5:16:18 PM

Dear Department of Environment and Natural Resources,

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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Tony Bollard

Borrooloola, Northern Territory, 0854, Australia

This email was sent by Tony Bollard via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Tony provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Tony Bollard at *****.

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Borchers, Clinton – Tuesday, 21 July 2020 – 18:00:31

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Clinton Borchers
Sent	7/21/2020 6:00:31 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

clinton borchers

Enoggera Reservoir, Queensland, 4520, Australia

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Bosold, Patrick – Tuesday, 21 July 2020 – 01:22:47

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Patrick Bosold
Sent	7/21/2020 1:22:47 AM

Dear Department of Environment and Natural Resources,

Having traveled through the Northern Territory some years ago, I have an appreciation for the country and its vulnerability to disruption by mining and other extraction activities, especially during the wet/monsoon season.

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water

and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue are proposed to be initially stored in a lined pit. Subject to sampling and testing results, drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal, then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough. If this waste is too dangerous for the NT, why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, and is the water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Patrick Bosold

Fairfield, Iowa, 52556, United States

This email was sent by Patrick Bosold via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Patrick provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Patrick Bosold at *****.

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Boxsell, Gregory – Monday, 20 July 2020 – 13:47:49

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Gregory Boxsell
Sent	7/20/2020 1:47:49 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Thank you for considering my concerns,

Yours sincerely,

Gregory Boxsell

Nightcliff, Northern Territory, 0810, Australia

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Bradstreet, Dion – Thursday, 30 July 2020 – 18:28:32

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dion Bradstreet
Sent	7/30/2020 6:28:32 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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Thank you for considering my concerns,

Yours sincerely,
Dion Bradstreet
Eighty Mile Beach, Western Australia, 6725, Australia

This email was sent by Dion Bradstreet via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Dion provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Dion Bradstreet at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Brand, Jeanette – Monday, 20 July 2020 – 17:23:57

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jeanette Brand
Sent	7/20/2020 5:23:57 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jeanette Brand

Bona Vista, Victoria, 3820, Australia

This email was sent by Jeanette Brand via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jeanette provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jeanette Brand at *****.

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Brand, Michael – Tuesday, 21 July 2020 – 12:33:42

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Michael Brand
Sent	7/21/2020 12:33:42 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Michael Brand

Marrara, Northern Territory, 0812, Australia

This email was sent by Michael Brand via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Michael provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Michael Brand at *****.

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Broadfield, Anteo – Monday, 20 July 2020 – 17:34:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Anteo Broadfield
Sent	7/20/2020 5:34:26 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Anteo Broadfield

Blackstone Heights, Tasmania, 7250, Australia

This email was sent by Anteo Broadfield via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Anteo provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Anteo Broadfield at *****.

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Brown, Louise – Monday, 20 July 2020 – 20:51:42

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Louise Brown
Sent	7/20/2020 8:51:42 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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Yours sincerely,

Louise Brown

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Louise Brown via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Louise provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Louise Brown at *****.

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Brown, SallyAnne – Monday, 20 July 2020 – 21:34:56

Subject	Reckless profiteering plans to shore up investor profiles: Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sally-Anne Brown
Sent	7/20/2020 9:34:56 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

It is destructive at every essential resource level: land air water and therefore, ecosystem. There are alternative strategies for energy that don't require damaging these. Full stop.

Detail you already know but are at risk of ignoring :

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and

Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,
Sally-Anne Brown
New South Wales, 2550, Australia

This email was sent by Sally-Anne Brown via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sally-Anne provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sally-Anne Brown at *****.

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Browning, Joan – Tuesday, 21 July 2020 – 07:51:53

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Joan Browning
Sent	7/21/2020 7:51:53 AM

Dear Department of Environment and Natural Resources,

I object to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns are:

IMPACTS TO PEOPLE AND COMMUNITIES

Possible negative impacts to people and communities posed by Imperial's drilling program include:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are pastoral properties with livestock and infrastructure in the vicinity or the Tenement. OT Downs Homestead is approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Joan Browning

Bar Beach, New South Wales, 2300, Australia

This email was sent by Joan Browning via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Joan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Joan Browning at *****.

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Brownrigg, Jane – Wednesday, 22 July 2020 – 14:43:28

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jane Brownrigg
Sent	7/22/2020 2:43:28 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jane Brownrigg

Fairfield, Victoria, 3078, Australia

This email was sent by Jane Brownrigg via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jane provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jane Brownrigg at *****.

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Burns, David – Monday, 20 July 2020 – 10:54:33

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	David Burns
Sent	7/20/2020 10:54:33 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
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- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

david burns

Bilyana, Queensland, 4854, Australia

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Please reply to david burns at *****.

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Campbell, Merinda – Thursday, 23 July 2020 – 08:06:38

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Merinda Campbell
Sent	7/23/2020 8:06:38 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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DISPOSAL OF WASTE

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Merinda Campbell

Darwin DC, Northern Territory, 0820, Australia

This email was sent by Merinda Campbell via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Merinda provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Merinda Campbell at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Carew, Janet – Tuesday, 28 July 2020 – 10:07:59

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Janet Carew
Sent	7/28/2020 10:07:59 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Janet Carew

Diamond Valley, Queensland, 4553, Australia

This email was sent by Janet Carew via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Janet provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Janet Carew at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Carland, Susanne – Thursday, 30 July 2020 – 15:13:16

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Susanne Carland
Sent	7/30/2020 3:13:16 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Thank you for considering my concerns,

Yours sincerely,

Susanne Carland

Perth, Western Australia, 6000, Australia

This email was sent by Susanne Carland via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Susanne provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Susanne Carland at *****.

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Carvalho, Natacha – Friday, 24 July 2020 – 17:16:48

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Natacha Carvalho
Sent	7/24/2020 5:16:48 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Natacha Carvalho

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Natacha Carvalho via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Natacha provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Natacha Carvalho at *****.

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Cashin, MargaretMary – Monday, 20 July 2020 – 21:59:33

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Margaret-Mary Cashin
Sent	7/20/2020 9:59:33 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Yours sincerely,

Margaret-Mary Cashin

Batman, Victoria, 3058, Australia

This email was sent by Margaret-Mary Cashin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Margaret-Mary provided an email address (*****) which we included in the REPLY-TO field.

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Ceh, Evica – Thursday, 30 July 2020 – 18:03:40

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Evica Ceh
Sent	7/30/2020 6:03:40 PM

Dear Department of Environment and Natural Resources,

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CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,
Evica Ceh

This email was sent by Evica Ceh via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Evica provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Evica Ceh at *****.

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Chadderton, John – Monday, 20 July 2020 – 12:17:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	John Chadderton
Sent	7/20/2020 12:17:26 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

John Chadderton

Footscray, Victoria, 3011, Australia

This email was sent by John Chadderton via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however John provided an email address (*****) which we included in the REPLY-TO field.

Please reply to John Chadderton at *****.

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Chalmers, Elizabeth – Saturday, 25 July 2020 – 20:02:55

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Elizabeth Chalmers
Sent	7/25/2020 8:02:55 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
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- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Elizabeth Chalmers

Tarrawanna, New South Wales, 2518, Australia

This email was sent by Elizabeth Chalmers via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Elizabeth provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Elizabeth Chalmers at *****.

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Chapel, Jessica – Tuesday, 28 July 2020 – 11:20:54

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jessica Chapel
Sent	7/28/2020 11:20:54 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jessica Chapel

This email was sent by Jessica Chapel via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jessica provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jessica Chapel at *****.

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Clarke, Matthew – Tuesday, 21 July 2020 – 00:35:42

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Matthew Clarke
Sent	7/21/2020 12:35:42 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Yours sincerely,

Matthew Clarke

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Please reply to Matthew Clarke at *****.

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Clifford, Jane – Thursday, 30 July 2020 – 19:20:17

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jane Clifford
Sent	7/30/2020 7:20:17 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not

only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns, my philanthropy supports the environment and my concerns for threatened species. We can't risk our environment and as Rio Tinto recently proved, we don't need anymore agents of environmental and cultural vandalism.

Yours sincerely,
Jane Clifford
Birchgrove, New South Wales, 2041, Australia

This email was sent by Jane Clifford via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jane provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jane Clifford at *****.

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Conje, Barbara – Tuesday, 28 July 2020 – 12:20:07

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Barbara Conje
Sent	7/28/2020 12:20:07 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Barbara Conje

This email was sent by Barbara Conje via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Barbara provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Barbara Conje at *****.

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Connolly, Niall – Friday, 24 July 2020 – 09:12:27

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Niall Connolly
Sent	7/24/2020 9:12:27 AM

Dear Department of Environment and Natural Resources,

As a former long term resident of Darwin in the Northern Territory I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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IMPACTS TO AIR QUALITY

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Niall Connolly

This email was sent by Niall Connolly via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Niall provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Niall Connolly at *****.

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Conroy, Bodil – Monday, 20 July 2020 – 15:36:41

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Bodil Conroy
Sent	7/20/2020 3:36:41 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Thank you for considering my concerns,

Yours sincerely,

Bodil Conroy

Moulden, Northern Territory, 0830, Australia

This email was sent by Bodil Conroy via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Bodil provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Bodil Conroy at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Conway, Sylvia – Thursday, 30 July 2020 – 10:10:19

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sylvia Conway
Sent	7/30/2020 10:10:19 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

sylvia Conway

Koah, Queensland, 4881, Australia

This email was sent by sylvia Conway via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however sylvia provided an email address (*****) which we included in the REPLY-TO field.

Please reply to sylvia Conway at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

CROWE, JUDITH – Tuesday, 21 July 2020 – 11:37:31

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	JUDITH CROWE
Sent	7/21/2020 11:37:31 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

JUDITH CROWE

Heddon Greta, New South Wales, 2321, Australia

This email was sent by JUDITH CROWE via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however JUDITH provided an email address (*****) which we included in the REPLY-TO field.

Please reply to JUDITH CROWE at *****.

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Czerniak, Anthony – Thursday, 23 July 2020 – 07:13:54

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Anthony Czerniak
Sent	7/23/2020 7:13:54 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

This email was sent by Anthony Czerniak via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Anthony provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Anthony Czerniak at *****.

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Dall, Skylen – Friday, 31 July 2020 – 07:25:33

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Skylen Dall
Sent	7/31/2020 7:25:33 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Skylen Dall

Curtin, Australian Capital Territory, 2605, Australia

This email was sent by Skylen Dall via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Skylen provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Skylen Dall at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Davey, Roger – Tuesday, 28 July 2020 – 22:00:38

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Roger Davey
Sent	7/28/2020 10:00:38 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

Yours sincerely,

Roger Davey

Girraween, Northern Territory, 0836, Australia

This email was sent by Roger Davey via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Roger provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Roger Davey at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Delamere, Carlos – Monday, 20 July 2020 – 11:27:12

Subject	I oppose the Imperial Oil and Gas wet season drilling program EP 187!
From	Carlos Delamere
Sent	7/20/2020 11:27:12 AM

Dear Department of Environment and Natural Resources,

It's unfortunate that time and time again we have to witness the further destruction of people's wellbeing and the earth we reside on because of the greed of others. That is why I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

Key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns. Do you want to support the destruction of life on this planet and erode away what's left of this beautiful country or support the change to make this place a positive and inhabitable environment for all life for centuries to come?

Yours sincerely,

Carlos Delamere

Burnside, Queensland, Australia

This email was sent by Carlos Delamere via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Carlos provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Carlos Delamere at *****.

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Delaney, Katherine – Tuesday, 21 July 2020 – 19:46:27

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Katherine Delaney
Sent	7/21/2020 7:46:27 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns match those of most I imagine but I was brought up in this beautiful part of Australia for the first half of my childhood. And this is such a threat to this beautiful ecosystem. Please take the following objections into consideration and do not allow this permit .

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Best wishes,

Katherine Delaney

This email was sent by Katherine Delaney via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Katherine provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Katherine Delaney at *****.

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Denholm, Hilary – Monday, 20 July 2020 – 13:33:09

Subject	Submission to Object to Imperial Oil and Gas Program EP 187
From	Hilary Denholm
Sent	7/20/2020 1:33:09 PM

Dear Department of Environment and Natural Resources,

I am a teacher and grandmother living in Sydney and doing everything I can to protect our beautiful country (and planet) for my grandchildren.

So I am writing to strongly object to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns, all of which are very important. It is hard to believe that you could ignore the urgent necessity to stop all such programs.

Yours sincerely,

Hilary Denholm

Waverley, New South Wales, 2024, Australia

This email was sent by Hilary Denholm via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Hilary provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Hilary Denholm at *****.

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Denner, Shon – Sunday, 26 July 2020 – 12:11:00

Subject	SUPPORT to Imperial Oil and Gas wet season drilling program EP 187
From	Shon Denner
Sent	7/26/2020 12:11:00 PM

Dear Department of Environment and Natural Resources,

I am writing to express my SUPPORT to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

Yours sincerely,
Shon Denner
Darwin City, Northern Territory, 0800, Australia

This email was sent by Shon Denner via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Shon provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Shon Denner at *****.

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Diaz, Susy – Friday, 31 July 2020 – 14:55:06

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Susy Diaz
Sent	7/31/2020 2:55:06 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Susy Diaz via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Susy provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Susy Diaz at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Diggles, Russell – Monday, 20 July 2020 – 12:57:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Russell Diggles
Sent	7/20/2020 12:57:39 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Russell Diggles

Burpengary, Queensland, 4505, Australia

This email was sent by Russell Diggles via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Russell provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Russell Diggles at *****.

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Dixon, Peter – Monday, 20 July 2020 – 13:01:25

Subject	I Object to Imperial Oil and Gas wet season drilling program EP 187
From	Peter Dixon
Sent	7/20/2020 1:01:25 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

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Thank you for considering my concerns,

Peter Dixon

Paterson Street

TENNANT CREEK

Yours sincerely,

Peter Dixon

Tennant Creek, Northern Territory, 0860, Australia

This email was sent by Peter Dixon via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Peter provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Peter Dixon at *****.

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Doecke, Susanne – Thursday, 23 July 2020 – 18:32:47

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Susanne Doecke
Sent	7/23/2020 6:32:47 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Susanne Doecke

White Gums, Northern Territory, 0870, Australia

This email was sent by Susanne Doecke via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Susanne provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Susanne Doecke at *****.

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Doyle, Jorgen – Tuesday, 28 July 2020 – 17:22:51

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jorgen Doyle
Sent	7/28/2020 5:22:51 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Yours sincerely,

Jorgen Doyle

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Duigu, Gabrielle – Monday, 20 July 2020 – 12:22:10

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Gabrielle Duigu
Sent	7/20/2020 12:22:10 PM

Dear Department of Environment and Natural Resources,

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Gabrielle Duigu

Cammeray, New South Wales, 2062, Australia

This email was sent by Gabrielle Duigu via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Gabrielle provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Gabrielle Duigu at *****.

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Dunning, Caryn – Wednesday, 29 July 2020 – 18:17:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Caryn Dunning
Sent	7/29/2020 6:17:56 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Caryn Dunning

Howard Springs, Northern Territory, 0835, Australia

This email was sent by Caryn Dunning via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Caryn provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Caryn Dunning at *****.

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Elliott, Ray – Monday, 27 July 2020 – 10:17:44

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Ray Elliott
Sent	7/27/2020 10:17:44 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Light pollution due to artificial lighting required for safe operations,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Ray Elliott

Port Davis, South Australia, 5540, Australia

This email was sent by Ray Elliott via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Ray provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Ray Elliott at *****.

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Ellis, Guy – Friday, 31 July 2020 – 14:37:16

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Guy Ellis
Sent	7/31/2020 2:37:16 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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This email was sent by Guy Ellis via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Guy provided an email address (*****) which we included in the REPLY-TO field.

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Ernst, Greg – Thursday, 23 July 2020 – 00:22:43

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Greg Ernst
Sent	7/23/2020 12:22:43 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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WET SEASON RISKS WITH WASTE ON SITE

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Yours sincerely,

Greg Ernst

White Rock, Queensland, 4868, Australia

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Eschborn, Marcus – Tuesday, 21 July 2020 – 02:29:36

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Marcus Eschborn
Sent	7/21/2020 2:29:36 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Marcus Eschborn via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Marcus provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Marcus Eschborn at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Eyre, Ms – Friday, 24 July 2020 – 11:08:31

Subject	Objection to Imperial Oil and Gas
From	Ms Eyre
Sent	7/24/2020 11:08:31 AM

To the Department of Environment and Natural Resources,

I have just heard about the planned drilling in NT - and am devastated. Enough destruction of the environment has been done - Now is the time for improvement, growth of the natural environment - not activities that enhance the potential harm and destruction. Please re-consider.

Hence, I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Ms Eyre

Dawesville, Western Australia, 6211, Australia

This email was sent by Ms Eyre via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Ms provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Ms Eyre at *****.

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Fahndrich, Annelise – Friday, 24 July 2020 – 08:08:14

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Annelise Fahndrich
Sent	7/24/2020 8:08:14 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Annelise Fahndrich

This email was sent by Annelise Fahndrich via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Annelise provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Annelise Fahndrich at *****.

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Fisher, Jay – Thursday, 30 July 2020 – 15:26:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jay Fisher
Sent	7/30/2020 3:26:56 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

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IMPACTS TO AIR QUALITY

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Thank you for considering my concerns,

This email was sent by Jay Fisher via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jay provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jay Fisher at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Fitzgibbon, Jenny – Thursday, 23 July 2020 – 11:15:00

Subject	Thank you for accepting my Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jenny Fitzgibbon
Sent	7/23/2020 11:15:00 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

It is a strong objection, placed with love for this planet and the species on it in my heart and mind.

My key concerns with this plan, besides that it is immoral and curses our children, mine and yours, are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jenny Fitzgibbon

North Maleny, Queensland, 4552, Australia

This email was sent by Jenny Fitzgibbon via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jenny provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jenny Fitzgibbon at *****.

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Flisk, Sandra – Monday, 20 July 2020 – 16:24:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sandra Flisk
Sent	7/20/2020 4:24:30 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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Thank you for considering my concerns,

Yours sincerely,

Sandra Flisk

Woodwark, Queensland, 4802, Australia

This email was sent by Sandra Flisk via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sandra provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sandra Flisk at *****.

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Flook, Nicola – Tuesday, 21 July 2020 – 22:17:50

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Nicola Flook
Sent	7/21/2020 10:17:50 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Light pollution due to artificial lighting required for safe operations,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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IMPACTS TO AIR QUALITY

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Nicola Flook

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Nicola Flook via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Nicola provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Nicola Flook at *****.

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Garcia, Adriana – Thursday, 30 July 2020 – 17:33:33

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Adriana Garcia
Sent	7/30/2020 5:33:33 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

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USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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- Impact to surface water due to inappropriate management of waste

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Adriana Garcia

North Wollongong, New South Wales, 2500, Australia

This email was sent by Adriana Garcia via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Adriana provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Adriana Garcia at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Geake, Joel – Monday, 20 July 2020 – 17:56:35

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Joel Geake
Sent	7/20/2020 5:56:35 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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WET SEASON RISKS WITH WASTE ON SITE

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Thank you for considering my concerns,

Yours sincerely,

Joel Geake

Rosedale South, Queensland, 4123, Australia

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Gohier, Franck – Monday, 27 July 2020 – 18:30:33

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Franck Gohier
Sent	7/27/2020 6:30:33 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Franck Gohier

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Franck Gohier via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Franck provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Franck Gohier at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Graham, Keith – Monday, 20 July 2020 – 13:30:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187 I'm have seen fire coming out of the ground casing bushfires from fracking!! You just don't know what could happen?
From	Keith Graham
Sent	7/20/2020 1:30:30 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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Thank you for considering my concerns,

Yours sincerely,

Keith Graham

Dumbalk North, Victoria, 3956, Australia

This email was sent by Keith Graham via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Keith provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Keith Graham at *****.

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Gwynne, Rozanne – Wednesday, 22 July 2020 – 19:14:21

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Rozanne Gwynne
Sent	7/22/2020 7:14:21 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Thank you for considering my concerns,

Yours sincerely,

Rozanne Gwynne

Nightcliff, Northern Territory, 0810, Australia

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Please reply to Rozanne Gwynne at *****.

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Hamiltons, Thomass – Monday, 20 July 2020 – 20:27:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Thomass Hamiltons
Sent	7/20/2020 8:27:26 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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Harge, Matt – Tuesday, 28 July 2020 – 10:07:54

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Matt Harge
Sent	7/28/2020 10:07:54 AM

Dear Department of Environment and Natural Resources,

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TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,
Matt Harge
Lucas, Victoria, 3350, Australia

This email was sent by Matt Harge via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Matt provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Matt Harge at *****.

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Harris, Steve – Friday, 31 July 2020 – 16:01:23

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Steve Harris
Sent	7/31/2020 4:01:23 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not

only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Steve Harris

Aldinga, South Australia, 5173, Australia

This email was sent by Steve Harris via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Steve provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Steve Harris at *****.

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Harrison, Louise – Tuesday, 28 July 2020 – 16:55:08

Subject	Submission - Imperial Oil and Gas wet season drilling program EP 187
From	Louise Harrison
Sent	7/28/2020 4:55:08 PM

Dear Department of Environment and Natural Resources,

Thank you for the opportunity to provide comment on the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

L. Harrison

Darwin, Northern Territory, 0800, Australia

This email was sent by Louise Harrison via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Louise provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Louise Harrison at *****.

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Hauser, Greg – Monday, 20 July 2020 – 13:59:16

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Greg Hauser
Sent	7/20/2020 1:59:16 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Greg Hauser

Mitchell, Northern Territory, 0832, Australia

This email was sent by Greg Hauser via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Greg provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Greg Hauser at *****.

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Hawthorne, Korina – Thursday, 30 July 2020 – 12:34:32

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Korina Hawthorne
Sent	7/30/2020 12:34:32 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

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USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Thank you for considering my concerns,

Yours sincerely,

Korina Hawthorne

Humpty doo

0836 Northern territory

This email was sent by Korina Hawthorne via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Korina provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Korina Hawthorne at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

HEADLAM, IAN – Thursday, 30 July 2020 – 20:08:10

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	IAN HEADLAM
Sent	7/30/2020 8:08:10 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

IAN HEADLAM

Queens Domain, Tasmania, 7000, Australia

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Please reply to IAN HEADLAM at *****.

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Heard, Shannon – Wednesday, 22 July 2020 – 07:46:37

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Shannon Heard
Sent	7/22/2020 7:46:37 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Shannon Heard

Tranmere, Tasmania, 7018, Australia

This email was sent by Shannon Heard via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Shannon provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Shannon Heard at *****.

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Helmore, Joel – Thursday, 30 July 2020 – 16:59:31

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Joel Helmore
Sent	7/30/2020 4:59:31 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Joel Helmore

Darwin DC, Northern Territory, 0820, Australia

This email was sent by Joel Helmore via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Joel provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Joel Helmore at *****.

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Hepburn, Julie – Tuesday, 21 July 2020 – 20:58:32

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Julie Hepburn
Sent	7/21/2020 8:58:32 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

There is no need for fracking. We should be investing time, energy, money and subsidies in to renewable energy based industries and employment

Also:

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
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- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Julie Hepburn

Howard Springs, Northern Territory, 0835, Australia

This email was sent by Julie Hepburn via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Julie provided an email address (*****) which we included in the REPLY-TO field.

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Heydon, Carl – Monday, 20 July 2020 – 13:09:54

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Carl Heydon
Sent	7/20/2020 1:09:54 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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DISPOSAL OF WASTE

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IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Carl Heydon

Booyong, New South Wales, 2480, Australia

This email was sent by Carl Heydon via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Carl provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Carl Heydon at *****.

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Higgins, Martina – Tuesday, 28 July 2020 – 10:15:22

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Martina (Tina) Bernardi Higgins
Sent	7/28/2020 10:15:22 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Thank you for considering my concerns,

Yours sincerely,

Martina (Tina) Higgins

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Martina (Tina) Bernardi Higgins via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Martina (Tina) provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Martina (Tina) Bernardi Higgins at *****.

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Hodgson, Ian – Monday, 20 July 2020 – 22:10:08

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Ian Hodgson
Sent	7/20/2020 10:10:08 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Ian Hodgson

Pokolbin, New South Wales, 2320, Australia

This email was sent by Ian Hodgson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Ian provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Ian Hodgson at *****.

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HODGSON, NAOMI – Monday, 20 July 2020 – 12:34:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	NAOMI HODGSON
Sent	7/20/2020 12:34:30 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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NAOMI HODGSON

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Holland, Noel – Wednesday, 22 July 2020 – 08:55:55

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Noel Holland
Sent	7/22/2020 8:55:55 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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Yours sincerely,

Noel Holland

Earlville, Queensland, 4870, Australia

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Hookham, Andrew – Wednesday, 29 July 2020 – 11:01:05

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Andrew Hookham
Sent	7/29/2020 11:01:05 AM

Dear Department of Environment and Natural Resources,

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Andrew Hookham

This email was sent by Andrew Hookham via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Andrew provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Andrew Hookham at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Hooper, Helen – Friday, 24 July 2020 – 08:26:28

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Helen Hooper
Sent	7/24/2020 8:26:28 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Helen Hooper

Annandale, New South Wales, 2038, Australia

This email was sent by Helen Hooper via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Helen provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Helen Hooper at *****.

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Hoosan, Gadrian – Thursday, 30 July 2020 – 17:08:55

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Gadrian Hoosan
Sent	7/30/2020 5:08:55 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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Thank you for considering my concerns,

Yours sincerely,

Gadrian Hoosan

Borroloola, Northern Territory, 0854, Australia

This email was sent by Gadrian Hoosan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Gadrian provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Gadrian Hoosan at *****.

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Houghton, Donella – Tuesday, 21 July 2020 – 22:43:11

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Donella Houghton
Sent	7/21/2020 10:43:11 PM

Dear Department of Environment and Natural Resources,

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My key concerns with this plan are outlined below.

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Hughes, Jennifer – Monday, 20 July 2020 – 12:48:47

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jennifer Hughes
Sent	7/20/2020 12:48:47 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jennifer Hughes

New South Wales, 2850, Australia

This email was sent by Jennifer Hughes via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jennifer provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jennifer Hughes at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Hutchinson, Terry – Tuesday, 21 July 2020 – 15:33:11

Subject	EP187 submission
From	Terry Hutchinson
Sent	7/21/2020 3:33:11 PM

Dear Department of Environment and Natural

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are that there is water flow from the north throughout Australia. We cannot allow private companies to poison the water table. This is not 1950 or even 1980. In 2020 we know the devastating effects of tampering with water. Water is the lifeblood of this nation.

My second concern is with the effects of these activities on the Birdlife of this area.

Surely the Australian government can do better than allow this to happen. This is an election issue!

Other mining companies have taken advantage of COVID to desecrate ancient sites.

Now this!

Other concerns are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,
Terry Hutchinson
Oxley, Queensland, 4075, Australia

Sent from my iPhone

Hutton, Colin – Tuesday, 21 July 2020 – 23:17:09

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Colin Hutton
Sent	7/21/2020 11:17:09 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Colin Hutton

Bundagen, New South Wales, 2454, Australia

This email was sent by Colin Hutton via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Colin provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Colin Hutton at *****.

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Isis, Bindi – Saturday, 25 July 2020 – 22:02:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Bindi Isis
Sent	7/25/2020 10:02:26 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

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Thank you for considering my concerns,

Yours sincerely,

Bindi Isis

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Please reply to Bindi Isis at *****.

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Jackson, Billie – Friday, 31 July 2020 – 14:43:35

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Billie Jackson
Sent	7/31/2020 2:43:35 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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Thank you for considering my concerns,

Yours sincerely,

billie jackson

Booyong, New South Wales, 2480, Australia

This email was sent by billie jackson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however billie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to billie jackson at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

James, Owen – Monday, 20 July 2020 – 15:50:22

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Owen James
Sent	7/20/2020 3:50:22 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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Drilling Activities will create a range of waste including:

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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Owen James via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Owen provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Owen James at *****.

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Jennaway, JeanLuc – Tuesday, 21 July 2020 – 07:40:32

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jean-Luc Jennaway
Sent	7/21/2020 7:40:32 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Jean-Luc Jennaway

South Australia, 5223, Australia

This email was sent by Jean-Luc Jennaway via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jean-Luc provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jean-Luc Jennaway at *****.

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Jones, Valmai – Friday, 24 July 2020 – 09:25:59

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Valmai Jones
Sent	7/24/2020 9:25:59 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

Yours sincerely,

Valmai Jones

Tennant Creek, Northern Territory, 0860, Australia

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Please reply to Valmai Jones at *****.

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K, Zoe – Wednesday, 22 July 2020 – 17:50:03

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Zoe K
Sent	7/22/2020 5:50:03 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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Emungalan, Northern Territory, 0850, Australia

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Kable, Vicki – Friday, 24 July 2020 – 20:50:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Vicki Kable
Sent	7/24/2020 8:50:56 PM

Dear Department of Environment and Natural Resources,

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Vicki Kable via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Vicki provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Vicki Kable at *****.

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Kaoustos, Gabrielle – Wednesday, 29 July 2020 – 17:51:07

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Gabrielle Kaoustos
Sent	7/29/2020 5:51:07 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
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- Completion, suspension and kill fluids

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Gabrielle Kaoustos

This email was sent by Gabrielle Kaoustos via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Gabrielle provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Gabrielle Kaoustos at *****.

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Kehoe, Olivia – Friday, 31 July 2020 – 13:53:09

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Olivia Kehoe
Sent	7/31/2020 1:53:09 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Impact to onsite indigenous heritage site not previously identified,
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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,
Olivia Kehoe

This email was sent by Olivia Kehoe via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Olivia provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Olivia Kehoe at *****.

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Kelly, John – Monday, 20 July 2020 – 11:30:05

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	John Kelly
Sent	7/20/2020 11:30:05 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

John Kelly

Shoal Point, Queensland, 4750, Australia

This email was sent by John Kelly via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however John provided an email address (*****) which we included in the REPLY-TO field.

Please reply to John Kelly at *****.

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Kent, Judyanne – Monday, 20 July 2020 – 19:35:44

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Judyanne Kent
Sent	7/20/2020 7:35:44 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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WET SEASON RISKS WITH WASTE ON SITE

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Thank you for considering my concerns,

Yours sincerely,

Judyanne Kent

Girraween, Northern Territory, 0836, Australia

This email was sent by Judyanne Kent via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Judyanne provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Judyanne Kent at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Kesteven, Sybil – Tuesday, 28 July 2020 – 13:12:41

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sybil Kesteven
Sent	7/28/2020 1:12:41 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

I have visited Borrooloola and the surrounding area in recent years and am extremely concerned that fracking should be allowed to happen in that region. The McArthur River is so important to the indigenous community which is already impacted by mining. My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and

Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Sybil Kesteven

Bondi, New South Wales, 2026, Australia

This email was sent by Sybil Kesteven via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sybil provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sybil Kesteven at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

King, Margaret – Thursday, 30 July 2020 – 17:42:12

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Margaret King
Sent	7/30/2020 5:42:12 PM

Dear Department of Environment and Natural Resources,

Better options than gas:

Investing in energy creation in the local area through a range of sustainable efficient energy options such as biodigestors, solar, wind, pumped hydro, etc. Would be a far better option than approving more fossil fuel destruction.

Winding down fossil fuels and investing in jobs in the local areas and Australian farming and mining companies by creating food, energy and micro industry (micro factories) in the local community could play a vital part of future economic plans. Here are some actions we can take;

I hope you will have a look at some of these ideas and seriously consider investing taxpayer funded resources and dollars into supporting Australian owned farms, mines and local areas into redirecting their operations into planting industrial hemp and developing a plant to product processing (biofuel, 3D Filament and 3D printer (microfactory) mirreco houses).

Given that we are one of the sunniest places on the planet, we now have an unprecedented opportunity to take advantage of this free natural resource. All it takes us a change in mindset and valuing what matters most Clean air, water and environment. These are essential to our survival and our current energy choices are not reflecting their importance.

If investors changed direction and government provided resources (defence forces, experts in the field under employed) to introduce sustainable energy sources Biodigestors, composters, solar and wind generators. and water efficient practices to Australian owned farms and mining operations and suburban areas. It would help people in all areas get back on their feet and reduce operating expenses.

Our current agricultural practices could do with a rethink. Industrial Hemp is a truly versatile textile which has been used to produce and fuel an airplane stronger then steel, build houses, paper, clothes, 3D filament, a superconductor better than graphene and the seed is highly nutritious. 5 to 10 Macadamia nuts a day are good for the heart. Chia and linseed are protein and nutrient rich.

Using regenerative farming practices reduces, water, fertilizer and pest control expense. We should be supplying our defence force and under employed resources to Australian owned farmers and mining operations to help them to change to regenerative farming practices and encouraging nutrient dense, water efficient multifunction plants (eg Hemp over cotton, maccas over almonds, chia and linseed over rice). Our defence force should be assisting in defence of our food.

Netherlands is the second biggest exporter of food in the world after the US , even though they are one of the smallest nations. This is because they grow everything in green houses which conserve nutrients, water and reduce pests. Solar powered

Hydroponic, aquaponic, vertical superfood production systems should be provided by the government to all Australian owned farm, mining operations and in suburbs. This is where I want my taxpayer dollars to go, what about you?

Check out The BZE million jobs plan launched on Monday (same day one of the largest frackers in the US filed for bankruptcy).

<https://bze.org.au/the-million-jobs-plan/>

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

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- Impact to surface water due to inappropriate management of waste

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Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Margaret King

Kenmore Hills, Queensland, 4069, Australia

This email was sent by Margaret King via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Margaret provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Margaret King at *****.

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King, Penny – Monday, 20 July 2020 – 16:50:18

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Penny King
Sent	7/20/2020 4:50:18 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
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- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

This email was sent by Penny King via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Penny provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Penny King at *****.

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Kinsela, Leigh – Thursday, 30 July 2020 – 16:50:14

Subject	Urgent Objection to Imperial Oil and Gas drilling program EP 187**
From	Leigh Kinsela
Sent	7/30/2020 4:50:14 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Leigh Kinsela

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Leigh Kinsela via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Leigh provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Leigh Kinsela at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Knox, Robin – Tuesday, 28 July 2020 – 14:24:32

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Robin Knox
Sent	7/28/2020 2:24:32 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

It is not worth sacrificing this land to make oil and gas production a reality in this area. There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
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DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Robin Knox

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Robin Knox via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Robin provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Robin Knox at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Koller, Claudia – Monday, 20 July 2020 – 20:22:48

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Claudia Koller
Sent	7/20/2020 8:22:48 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

This email was sent by Claudia Koller via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Claudia provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Claudia Koller at *****.

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Koser, Di – Tuesday, 28 July 2020 – 10:31:15

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Di Koser
Sent	7/28/2020 10:31:15 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

We have enough gas already developed to transition to a 100% Renewable economy!!

The economics of fracking don't add up!

There is no social licence for fracking.

Carbon emissions from fracking cannot be offset!

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Di Koser

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Please reply to Di Koser at *****.

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Kretser, Steve – Tuesday, 28 July 2020 – 12:07:41

Subject	N.T. the place to be
From	Steve De Kretser
Sent	7/28/2020 12:07:41 PM

Dear ole mates at the Department of Environmental Destruction and Exploitation of Natural Resources,

I've lived in the NT since 1971, and intend to eventually die here. Its one of the least spoiled, cleanest, greenest and wildest places in the world. I'll try to keep it this way. I hope you will as well.

Politicians come and go, (remember Giles?...what a dickhead) but the air, water and soil are forever. I'd happily support drilling into a politician, but certainly DO NOT support any drilling exploration by the fracking industry.

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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Thank you for considering my concerns,

Yours sincerely,

Steve de Kretser

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Kroes, Maria – Friday, 24 July 2020 – 09:46:15

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Maria Kroes
Sent	7/24/2020 9:46:15 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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TRANSPORT RISKS AND TOURISM IMPACTS

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Maria Kroes

Euromina, South Australia, 5454, Australia

This email was sent by Maria Kroes via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Maria provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Maria Kroes at *****.

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Ladkin, Sharon – Friday, 31 July 2020 – 16:40:34

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sharon Ladkin
Sent	7/31/2020 4:40:34 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Sharon Ladkin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sharon provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sharon Ladkin at *****.

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Lake, Vanessa – Thursday, 23 July 2020 – 07:47:51

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Vanessa Lake
Sent	7/23/2020 7:47:51 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

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Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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IMPACTS TO AIR QUALITY

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Vanessa Lake

Skennars Head, New South Wales, 2478, Australia

This email was sent by Vanessa Lake via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Vanessa provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Vanessa Lake at *****.

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Lawrie, Bunna – Friday, 24 July 2020 – 09:02:13

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Bunna Lawrie
Sent	7/24/2020 9:02:13 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Frederique Robert

Collingwood North, Victoria, 3066, Australia

This email was sent by Bunna Lawrie via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Bunna provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Bunna Lawrie at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Leah, Penny – Tuesday, 21 July 2020 – 20:59:11

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Penny Leah
Sent	7/21/2020 8:59:11 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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Thank you for considering my concerns,

Yours sincerely,

Penny Leah

Wollogorang, New South Wales, 2581, Australia

This email was sent by Penny Leah via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Penny provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Penny Leah at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Ledger, Annie – Tuesday, 28 July 2020 – 10:37:06

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Annie Ledger
Sent	7/28/2020 10:37:06 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Annie Ledger

North Maleny, Queensland, 4552, Australia

This email was sent by Annie Ledger via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Annie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Annie Ledger at *****.

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Ledgerwood, Jessica – Tuesday, 21 July 2020 – 21:10:46

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jessica Ledgerwood
Sent	7/21/2020 9:10:46 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jessica Ledgerwood

Hamilton DC, New South Wales, 2303, Australia

This email was sent by Jessica Ledgerwood via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jessica provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jessica Ledgerwood at *****.

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Lee, Am – Friday, 24 July 2020 – 18:22:36

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Am Lee
Sent	7/24/2020 6:22:36 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Am Lee

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Please reply to Am Lee at *****.

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Lewis, Jenny – Thursday, 30 July 2020 – 18:45:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jenny Lewis
Sent	7/30/2020 6:45:39 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Jenny Lewis

This email was sent by Jenny Lewis via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jenny provided an email address (*****) which we included in the REPLY-TO field.

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Lewis, Jerome – Monday, 20 July 2020 – 13:56:16

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jerome Lewis
Sent	7/20/2020 1:56:16 PM

Dear Department of Environment and Natural Resources,

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jerome Lewis

Skennars Head, New South Wales, 2478, Australia

This email was sent by Jerome Lewis via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jerome provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jerome Lewis at *****.

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Lieman, Tan – Wednesday, 22 July 2020 – 19:35:03

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Tan Lieman
Sent	7/22/2020 7:35:03 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Tan Lieman

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Please reply to Tan Lieman at *****.

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Lisle, Patsy – Monday, 20 July 2020 – 18:49:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Patsy Lisle
Sent	7/20/2020 6:49:39 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

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Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Patsy Lisle

Mallacoota, Victoria, 3892, Australia

This email was sent by Patsy Lisle via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Patsy provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Patsy Lisle at *****.

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Logan, Fiona – Friday, 31 July 2020 – 14:31:54

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Fiona Logan
Sent	7/31/2020 2:31:54 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Fiona Logan

Yours sincerely,

Fiona Logan

Howitt, Queensland, 4890, Australia

This email was sent by Fiona Logan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Fiona provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Fiona Logan at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Lubow, Soo – Wednesday, 22 July 2020 – 16:12:14

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Soo Lubow
Sent	7/22/2020 4:12:14 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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Lucas, Beatrice – Thursday, 30 July 2020 – 18:28:50

Subject	Object to Imperial Oil and Gas wet season drilling program EP 187
From	Beatrice Lucas
Sent	7/30/2020 6:28:50 PM

Dear Department of Environment and Natural Resources,

As a previous NT resident I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Beatrice Lucas

Clifton Beach, Queensland, 4879, Australia

This email was sent by Beatrice Lucas via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Beatrice provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Beatrice Lucas at *****.

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Macmanus, Eileen – Friday, 31 July 2020 – 15:29:28

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Eileen Macmanus
Sent	7/31/2020 3:29:28 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Eileen MacManus

Bracken Ridge, Queensland, 4017, Australia

This email was sent by Eileen MacManus via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Eileen provided an email address (*****n) which we included in the REPLY-TO field.

Please reply to Eileen MacManus at *****n.

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Marks, Jan – Monday, 20 July 2020 – 17:19:14

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jan Marks
Sent	7/20/2020 5:19:14 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jan Marks

This email was sent by Jan Marks via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jan Marks at *****.

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Marshall, Ruby – Monday, 20 July 2020 – 10:59:41

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Ruby Marshall
Sent	7/20/2020 10:59:41 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

I have outlined my key concerns with this plan below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts on people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

I am strongly opposed to this project and do not think it should go ahead.

Thank you for considering my concerns,

Yours sincerely,

Ruby Marshall

White Gums, Northern Territory, 0870, Australia

This email was sent by Ruby Marshall via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Ruby provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Ruby Marshall at *****.

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Martin, Jean – Friday, 24 July 2020 – 08:49:08

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jean Martin
Sent	7/24/2020 8:49:08 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Jean Claire Martin BFA (Hons1)

Former NT resident of 23yrs

Phd Candidate, Griffith University

This email was sent by Jean Martin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jean provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jean Martin at *****.

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Matthews, Taylor – Friday, 24 July 2020 – 07:58:50

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Taylor Matthews
Sent	7/24/2020 7:58:50 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

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Thank you for considering my concerns,

Yours sincerely,

Taylor Matthews

Mitchell, Northern Territory, 0832, Australia

This email was sent by Taylor Matthews via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Taylor provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Taylor Matthews at *****.

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Mayger, IngeLise – Thursday, 23 July 2020 – 23:10:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Inge-Lise Mayger
Sent	7/23/2020 11:10:39 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Inge-Lise Mayger

Darwin Northern Territory, 0810, Australia

This email was sent by Inge-Lise Mayger via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Inge-Lise provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Inge-Lise Mayger at *****.

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Mccarhty, Kevin – Monday, 20 July 2020 – 15:40:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kevin Mccarhty
Sent	7/20/2020 3:40:56 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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Thank you for considering my concerns,

Yours sincerely,
Kevin McCarthy
Marrara, Northern Territory, 0812, Australia

This email was sent by Kevin McCarthy via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Kevin provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Kevin McCarthy at *****.

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Mccormack, Jenny – Wednesday, 22 July 2020 – 08:32:27

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jenny Mccormack
Sent	7/22/2020 8:32:27 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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WET SEASON RISKS WITH WASTE ON SITE

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Thank you for considering my concerns,

Yours sincerely,
jenny McCormack
Dumbalk North, Victoria, 3956, Australia

This email was sent by jenny McCormack via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however jenny provided an email address (*****) which we included in the REPLY-TO field.

Please reply to jenny McCormack at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Mcevoy, Andrew – Monday, 20 July 2020 – 22:05:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Andrew Mcevoy
Sent	7/20/2020 10:05:39 PM

Dear Department of Environment and Natural Resources,

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WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Andrew McEvoy

Driver, Northern Territory, 0830, Australia

This email was sent by Andrew McEvoy via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Andrew provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Andrew McEvoy at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Mcgugan, Stephen – Sunday, 26 July 2020 – 13:51:08

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Stephen Mcgugan
Sent	7/26/2020 1:51:08 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Stephen McGugan

Marrara, Northern Territory, 0812, Australia

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Please reply to Stephen McGugan at *****.

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Mcintyre, Heather – Friday, 24 July 2020 – 19:27:05

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Heather McIntyre
Sent	7/24/2020 7:27:05 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Heather McIntyre

East Side Northern Territory, 0870, Australia

This email was sent by Heather McIntyre via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Heather provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Heather McIntyre at *****.

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Meldrum, Garnet – Tuesday, 21 July 2020 – 14:07:11

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Garnet Meldrum
Sent	7/21/2020 2:07:11 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Melican, Maree – Tuesday, 28 July 2020 – 16:52:16

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Maree Melican
Sent	7/28/2020 4:52:16 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Maree Melican

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Maree Melican via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Maree provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Maree Melican at *****.

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Middleton, Sandie – Friday, 31 July 2020 – 15:30:41

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sandie Middleton
Sent	7/31/2020 3:30:41 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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Thank you for considering my concerns,

Yours sincerely,

sandie middleton

This email was sent by sandie middleton via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however sandie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to sandie middleton at *****.

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Mills, Jeanette – Thursday, 30 July 2020 – 19:34:02

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jeanette Mills
Sent	7/30/2020 7:34:02 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Light pollution due to artificial lighting required for safe operations,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jeanette Mills

Beerwah, Queensland, 4519, Australia

This email was sent by Jeanette Mills via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jeanette provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jeanette Mills at *****.

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Morgan, Dominique – Tuesday, 28 July 2020 – 11:37:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dominique Morgan
Sent	7/28/2020 11:37:26 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Dominique Morgan

Bucketty, New South Wales, 2250, Australia

This email was sent by Dominique Morgan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Dominique provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Dominique Morgan at *****.

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Morison, Robert – Monday, 20 July 2020 – 14:47:57

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Robert Morison
Sent	7/20/2020 2:47:57 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

Yours sincerely,

Robert Morison

Stanthorpe, Queensland, 4380, Australia

This email was sent by Robert Morison via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Robert provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Robert Morison at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

MORONY, Amanda – Tuesday, 28 July 2020 – 11:54:07

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Amanda MORONY
Sent	7/28/2020 11:54:07 AM

Dear Department of Environment and Natural Resources,

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Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Amanda MORONY

Woodville Park, South Australia, 5011, Australia

This email was sent by Amanda MORONY via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Amanda provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Amanda MORONY at *****.

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Morrigan, Viviane – Tuesday, 28 July 2020 – 14:07:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Viviane Morrigan
Sent	7/28/2020 2:07:30 PM

Dear Department of Environment and Natural Resources,

I live in NSW and am concerned about worldwide environmental damage from global warming, and the Northern Territory government's contributory role if it continues to support non-renewable energy. Your decisions in this matter affect all Australians and beyond.

I wish to register my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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Thank you for considering my concerns,

Yours sincerely,

Viviane Morrigan

PO Box 168

Roselands, New South Wales, 2196, Australia

This email was sent by Viviane Morrigan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Viviane provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Viviane Morrigan at *****.

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Morris, Steve – Thursday, 30 July 2020 – 16:05:37

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Steve Morris
Sent	7/30/2020 4:05:37 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Thank you for considering my concerns,

Yours sincerely,

Steve Morris

Rum Jungle, Northern Territory, 0822, Australia

This email was sent by Steve Morris via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Steve provided an email address (*****) which we included in the REPLY-TO field.

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Murphy, Dan – Monday, 20 July 2020 – 19:24:06

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dan Murphy
Sent	7/20/2020 7:24:06 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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Yours sincerely,

Dan Murphy

White Gums, Northern Territory, 0870, Australia

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Murray, Phillip – Friday, 24 July 2020 – 09:27:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Phillip Murray
Sent	7/24/2020 9:27:56 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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- Drilling fluids which include toxic biocides
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Phillip Murray

Booyong, New South Wales, 2480, Australia

This email was sent by Phillip Murray via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Phillip provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Phillip Murray at *****.

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Murrin, Glenda – Monday, 20 July 2020 – 11:14:19

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Glenda Murrin
Sent	7/20/2020 11:14:19 AM

Let It Be Known

To the Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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- Produced water which could include naturally occurring radioactive materials
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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Glenda Murrin

Gympie, Queensland, 4570, Australia

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Please reply to Glenda Murrin at *****.

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Newham, Dianna – Tuesday, 28 July 2020 – 20:25:18

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dianna Newham
Sent	7/28/2020 8:25:18 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

First and foremost, the Imperial's Revised EMP does not align with the principles of ecologically sustainable development, specifically the principle of inter-generational equity, intra-generational equity and the

polluter pays. The development of an onshore unconventional gas industry is inconsistent with actions that are necessary to keep global climate change below 1.5oC. This EMP could facilitate the large-scale

development of the industry, thereby jeopardizing global mitigation efforts and compromising the health and stability of future generations.

Secondly, while the Scientific Inquiry Into Hydraulic Fracturing In The Northern Territory stated that risks could be reduced to an acceptable level, it also stated that there was insufficient information available to

make a fully informed decision about potential impact on groundwater resources. The Revised EMP does not properly assess the risk by failing to acknowledge that uncertainty in knowledge.

I also have strong concerns about specific aspects of the EMP:

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial's drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the

Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Dianna Newham

Alice Springs, Northern Territory, 0870, Australia

This email was sent by Dianna Newham via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Dianna provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Dianna Newham at *****.

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Norman, Mark – Wednesday, 22 July 2020 – 08:17:12

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Mark Norman
Sent	7/22/2020 8:17:12 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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CHEMICAL AND DRILLING FLUIDS TO BE USED

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Mark Norman

New South Wales, 2350, Australia

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Please reply to Mark Norman at *****.

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Norrington, Leonie – Tuesday, 28 July 2020 – 10:12:24

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Leonie Norrington
Sent	7/28/2020 10:12:24 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

leonie norrington

Manton, Northern Territory, 0837, Australia

This email was sent by leonie norrington via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however leonie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to leonie norrington at *****.

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Norton, Naomi – Monday, 27 July 2020 – 22:07:46

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Naomi Norton
Sent	7/27/2020 10:07:46 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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- Produced water which could include naturally occurring radioactive materials
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Naomi Norton

Mitchell, Northern Territory, 0832, Australia

This email was sent by Naomi Norton via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Naomi provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Naomi Norton at *****.

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Oakley, Jeny – Wednesday, 29 July 2020 – 08:42:23

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jeny Oakley
Sent	7/29/2020 8:42:23 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jeny Oakley

Northwood, Victoria, 3660, Australia

This email was sent by Jeny Oakley via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jeny provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jeny Oakley at *****.

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Ocallaghan, Sue – Wednesday, 22 July 2020 – 13:50:58

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187 from Sue and Max O'Callaghan
From	Sue And Max O'callaghan
Sent	7/22/2020 1:50:58 PM

Dear Department of Environment and Natural Resources,

We are writing to express our objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My husband Max was born in Alice Springs and I have lived here for 55 years. We attended the meeting in Alice Springs where the Draft Final Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory was presented. Although the conclusion was that fracking could be managed successfully if all recommendations were strictly adhered to, the overwhelming feeling from the panel and audience was that Government and Industries who wanted to be involved would never have the will or the finance to comply! The fact that many of the recommendations in the Report have been ignored by both the Government and Imperial Oil and Gas means that the risks involved with fracking cannot be mitigated.

Clean water for drinking is our most valuable and necessary asset. Water for agriculture, cattle raising, manufacturing, cultural beliefs and recreation are also of prime importance. In short for LIFE!

We in the Northern Territory simply cannot risk any venture that might threaten our precious and limited reserve and supply of water. We already have evidence in the Katherine area and in other areas in the Territory and Australia of the problems caused by contaminated water.

Some more of our key concerns are:

- chemicals used in the drilling process
- storage of contaminated water in open pits and tanks
- the disposal of waste materials
- disturbance and destruction of sacred sites
- disturbance and destruction of wildlife in the area - habitat, food supply, safety
- destruction of our beautiful and unique country so important for tourism and the enjoyment of locals.

Thank you for your attention to our concerns. Please BAN fracking permanently in the Northern Territory.

Yours sincerely,
Sue and Max O'Callaghan
Alice Springs, NT 0870

This email was sent by Sue and Max O'Callaghan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sue and Max provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sue and Max O'Callaghan at *****.

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OdlingSmee, David – Monday, 20 July 2020 – 15:35:15

Subject	Please consider the negative impacts from the Imperial Oil and Gas drilling program EP 187
From	David Odling-Smee
Sent	7/20/2020 3:35:15 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
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- Increased intensity of flooding from land clearing and drilling activities,
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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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CHEMICAL AND DRILLING FLUIDS TO BE USED

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TRANSPORT RISKS AND TOURISM IMPACTS

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Thank you for considering my concerns,

Yours sincerely,

David Odling-Smee

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Please reply to David Odling-Smee at *****.

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O'keefe, Allan – Tuesday, 28 July 2020 – 18:55:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Allan O'keefe
Sent	7/28/2020 6:55:39 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

Yours sincerely,

Allan O'Keefe

This email was sent by Allan O'Keefe via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Allan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Allan O'Keefe at *****.

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OKeefe, Susan – Tuesday, 28 July 2020 – 19:30:34

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Susan O'Keefe
Sent	7/28/2020 7:30:34 PM

Dear Department of Environment and Natural Resources,

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WET SEASON RISKS WITH WASTE ON SITE

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It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Susan O'Keefe

Dundee Beach, Northern Territory, 0840, Australia

This email was sent by Susan O'Keefe via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Susan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Susan O'Keefe at *****.

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OLoughlin, Nick – Thursday, 30 July 2020 – 19:03:12

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Nick O'Loughlin
Sent	7/30/2020 7:03:12 PM

Dear Department of Environment and Natural Resources,

There should be absolutely no drilling until the SREBA is completed.

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Nick O’Loughlin

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Nick O’Loughlin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Nick provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Nick O’Loughlin at *****.

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Oneill, Les – Monday, 20 July 2020 – 12:20:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Les Oneill
Sent	7/20/2020 12:20:26 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Les Oneill

Houtman Abrolhos, Western Australia, 6530, Australia

This email was sent by Les Oneill via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Les provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Les Oneill at *****.

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Oomen, M – Tuesday, 21 July 2020 – 01:28:43

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	M Oomen
Sent	7/21/2020 1:28:43 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Oreilly, Rachel – Monday, 20 July 2020 – 23:01:20

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Rachel O'reilly
Sent	7/20/2020 11:01:20 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Rachel O'Reilly via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Rachel provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Rachel O'Reilly at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Osh, Harry – Tuesday, 28 July 2020 – 10:51:55

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Harry Osh
Sent	7/28/2020 10:51:55 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Harald Osh

This email was sent by Harry Osh via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Harry provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Harry Osh at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Owheel, Monica – Tuesday, 28 July 2020 – 15:17:41

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Monica O'wheel
Sent	7/28/2020 3:17:41 PM

Dear Department of Environment and Natural Resources,

As an Australian, I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

CLIMATE CHANGE

I am also concerned about Climate Change and adding more fossil fuels into the economy and the atmosphere. We don't want to lose our world in all its beauty with the extremes of weather from the increased heat in the natural systems of water, atmosphere and sea.

Thank you for considering my concerns,

Yours sincerely,

Monica O'Wheel

Felixstow, South Australia, 5070, Australia

This email was sent by Monica O'Wheel via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Monica provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Monica O'Wheel at *****.

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Parrish, Ange – Tuesday, 28 July 2020 – 10:08:24

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Ange Parrish
Sent	7/28/2020 10:08:24 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

ange parrish

New South Wales, 2840 (temporary), Australia

This email was sent by ange parrish via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however ange provided an email address (*****) which we included in the REPLY-TO field.

Please reply to ange parrish at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Parsonson, Sharon – Friday, 24 July 2020 – 18:37:16

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sharon Parsonson
Sent	7/24/2020 6:37:16 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Thank you for considering my concerns,

This email was sent by Sharon Parsonson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sharon provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sharon Parsonson at *****.

To learn more about Do Gooder visit www.dogooder.co

To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Parsonson, Sharon – Tuesday, 28 July 2020 – 10:04:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sharon Parsonson
Sent	7/28/2020 10:04:30 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Sharon Parsonson

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Sharon Parsonson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sharon provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sharon Parsonson at *****.

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Peek, Dirk – Tuesday, 28 July 2020 – 12:28:54

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dirk Peek
Sent	7/28/2020 12:28:54 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Dirk Peek

Nightcliff, Northern Territory, 0810, Australia

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Please reply to Dirk Peek at *****.

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Perrot, Moana – Friday, 31 July 2020 – 16:08:14

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Moana Perrot
Sent	7/31/2020 4:08:14 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

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Thank you for considering my concerns,

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Please reply to Moana Perrot at *****.

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Phillips, Shane – Tuesday, 28 July 2020 – 14:24:48

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Shane Phillips
Sent	7/28/2020 2:24:48 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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Yours sincerely,

Shane Phillips

Moulden, Northern Territory, 0830, Australia

This email was sent by Shane Phillips via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Shane provided an email address (*****) which we included in the REPLY-TO field.

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Pickering, Charlotte – Tuesday, 28 July 2020 – 10:36:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Charlotte Pickering
Sent	7/28/2020 10:36:56 AM

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TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,
Charlotte Pickering
Katherine, Northern Territory, 0851, Australia

This email was sent by Charlotte Pickering via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Charlotte provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Charlotte Pickering at *****.

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Pidcock, Christel – Monday, 20 July 2020 – 12:53:55

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Christel Pidcock
Sent	7/20/2020 12:53:55 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Christel Pidcock

Charlton, Queensland, 4350, Australia

This email was sent by Christel Pidcock via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Christel provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Christel Pidcock at *****.

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Potter, Catherine – Thursday, 23 July 2020 – 11:21:51

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Catherine Potter
Sent	7/23/2020 11:21:51 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

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IMPACTS TO AIR QUALITY

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Catherine Potter

Agnes Water, Queensland, 4677, Australia

This email was sent by Catherine Potter via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Catherine provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Catherine Potter at *****.

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Powell, Danielle – Tuesday, 21 July 2020 – 08:52:13

Subject	Opposition to Imperial Oil and Gas drilling EP 187
From	Danielle Powell
Sent	7/21/2020 8:52:13 AM

Dear Department of Environment and Natural Resources,

I am writing to express my strong objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

Having just returned to my home in Alice Springs after an incredible trip through the Top End, I am now prompted to speak up. Where else in the world can we see such beauty and riches?

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water

and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Danielle Powell

Alice Springs, Northern Territory, 0870, Australia

This email was sent by Danielle Powell via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Danielle provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Danielle Powell at *****.

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Price, Lesleyanne – Friday, 24 July 2020 – 10:09:45

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Lesleyanne Price
Sent	7/24/2020 10:09:45 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

LesleyAnne Price

Moulden, Northern Territory, 0830, Australia

This email was sent by LesleyAnne Price via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however LesleyAnne provided an email address (*****) which we included in the REPLY-TO field.

Please reply to LesleyAnne Price at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

RAY, ALLAN – Monday, 20 July 2020 – 13:00:06

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	ALLAN RAY
Sent	7/20/2020 1:00:06 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not

only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

ALLAN RAY

Brunswick, Victoria, 3056, Australia

This email was sent by ALLAN RAY via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however ALLAN provided an email address (*****) which we included in the REPLY-TO field.

Please reply to ALLAN RAY at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Rees, Annie – Tuesday, 28 July 2020 – 10:48:58

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Annie Rees
Sent	7/28/2020 10:48:58 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Annie Rees

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Annie Rees via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Annie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Annie Rees at *****.

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Reid, Melanie – Thursday, 30 July 2020 – 17:10:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Melanie Reid
Sent	7/30/2020 5:10:56 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not

only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

This email was sent by Melanie Reid via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****

however Melanie provided an email address (*****
REPLY-TO field.

Please reply to Melanie Reid at *****.

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Rhoades, Victoria – Tuesday, 21 July 2020 – 07:12:27

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Victoria Rhoades
Sent	7/21/2020 7:12:27 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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Thank you for considering my concerns,

Yours sincerely,

Victoria Rhoades

This email was sent by Victoria Rhoades via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Victoria provided an email address (*****) which we included in the REPLY-TO field.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Richardson, Ghar – Thursday, 30 July 2020 – 18:47:52

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Ghar Richardson
Sent	7/30/2020 6:47:52 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Ghar Richardson

This email was sent by Ghar Richardson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Ghar provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Ghar Richardson at *****.

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Rickard, Diana – Tuesday, 21 July 2020 – 14:50:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Diana Rickard
Sent	7/21/2020 2:50:30 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

I have lived and worked in the NT for nearly 50 years and it is in my blood. Our country is not a quarry. It is unique and beautiful and I love it dearly.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be

open and accessible to birdlife at any time. So many of our native and migratory birds are endangered or close to extinction due to inappropriate development.

Our 'leaders' even blame birds and animals for spreading diseases but scientists have strong evidence that it's human impact on natural habitats responsible for this. And - what could be more invasive than open mining pits and polluted water on our precious wildlife?

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial's drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,

- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

I live in a rural area that relies on groundwater for drinking and other domestic purposes. I understand what the people around the Imperial lease must be feeling.

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous. We've had too many cases of 'concrete cancer' in the Top End already for us to trust this form of production infrastructure for water protection.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities. When this is added to increased carbon pollution from intensive bushfires, there goes our carbon abatement plans!

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the

Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed. We must have a written guarantee (along with a hefty bond) for Imperial to adequately rehabilitate all Country affected by its mining activities.

I would like to continue to enjoy the beauty and enthusiasm of the tropical environment of the NT without worrying about unbridled corporatism taking over and wilfully destroying all that makes the NT a great place to be. I need your healthy concerns to match mine for this to happen.

Thank you for considering my concerns,

Yours sincerely,

Diana Rickard

Berry Springs, Northern Territory, 0838, Australia

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Please reply to Diana Rickard at *****.

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Riederer, Karin – Tuesday, 28 July 2020 – 10:23:52

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Karin Riederer
Sent	7/28/2020 10:23:52 AM

Dear Department of Environment and Natural Resources,

As a former resident of Borroloola (with family who reside there) and Alice Springs, NT, and an active volunteer with BirdLife Australia, I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program, including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite Indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas,
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity of the Tenement. The nearest property is OT Downs Homestead located approximately 20km north-west of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not

only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater”.

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure,
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste.

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials,
- Drilling fluids which include toxic biocides,
- Drilling cuttings which could include naturally occurring radioactive materials,
- Completion, suspension and kill fluids.

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes". This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes". Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns, and please heed them.

Yours sincerely

Karin Riederer, former resident of Alice Springs and Borroloola, NT; currently of Maslin Beach, South Australia, 5170, Australia

This email was sent by Karin Riederer via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Karin provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Karin Riederer at *****.

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Ritchie, Therese – Wednesday, 22 July 2020 – 17:55:16

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Therese Ritchie
Sent	7/22/2020 5:55:16 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Therese Ritchie

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Therese Ritchie via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Therese provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Therese Ritchie at *****.

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Robert, Frederique – Friday, 24 July 2020 – 09:01:28

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Frederique Robert
Sent	7/24/2020 9:01:28 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Frederique Robert

Collingwood North, Victoria, 3066, Australia

This email was sent by Frederique Robert via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Frederique provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Frederique Robert at *****.

To learn more about Do Gooder visit www.dogooder.co

To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Robertson, Tony – Monday, 20 July 2020 – 14:27:36

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Tony Robertson
Sent	7/20/2020 2:27:36 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Tony Robertson

Smythes Creek, Victoria, 3351, Australia

This email was sent by Tony Robertson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Tony provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Tony Robertson at *****.

To learn more about Do Gooder visit www.dogooder.co

To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Robins, Crystal – Monday, 20 July 2020 – 10:12:53

Subject	TRM: Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Crystal Robins
Sent	7/20/2020 10:12:53 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Crystal Robins

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Crystal Robins via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Crystal provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Crystal Robins at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Robins, Dan – Friday, 17 July 2020 – 18:01:50

Subject	TRM: Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dan Robins
Sent	7/17/2020 6:01:50 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- * Increased potential for accidents and damage to infrastructure due to vehicle movements,
- * Impact to onsite indigenous heritage site not previously identified,
- * Land biodiversity impact due to heavy machinery movements,
- * Increased intensity of flooding from land clearing and drilling activities,
- * Noise and vibration due to vehicles movements, civil works and drilling activities,
- * Light pollution due to artificial lighting required for safe operations,
- * Disturbance to heritage sites due to works conducted out of the approved areas.
- * Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

It is anticipated that 2.5ML of water will be required for Imperial Oil and Gas' drilling activities.

A number of negative impacts to water are posed by Imperial's drilling program including:

- * Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- * Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- * Contamination of water bodies due to storage (tank/vessels) failure,
- * Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria. The Glyde is the main tributary to the McArthur River and lies to the east of the study area.

The Chambers River Formation and Cambrian Limestone provide regional scale aquifers for groundwater resources available for pastoral enterprises, domestic bores at homesteads and town water supplies several remote communities across the region.

Among the various formations to be intersected during drilling, the Gum Ridge Aquifer is expected to be encountered at an approximate depth of *****m.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However it is well known that cement will crack overtime and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admits that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- * Produced water which could include naturally occurring radioactive materials
- * Drilling fluids which include toxic biocides
- * Drilling cuttings which could include naturally occurring radioactive materials
- * Completion, suspension and kill fluids

A list of the potential chemicals in the drilling fluids include: Bentonite API Weighting agent/viscosifier Calcium Carbonate Weighting agent/Bridging agent Caustic Soda pH adjustment Citric Acid pH adjustment Glut 9 Biocide Magnesium Oxide Conditioning chemical PAC LV Fluid loss additive PHPA Encapsulation Potassium Carbonate Potassium carbonate Potassium Chloride (KCl) Inhibitor Salt Weighting agent SAPP (Sodium Acid Pyrophosphate) Dispersant Soda Ash pH adjustment Sodium Bicarbonate pH adjustment Sodium Sulphite Oxygen scavenger TEA HT polymer stabiliser Thinpool Thinner Xanthan Gum Viscosity. These chemicals could have an impact on the quality of soil and water in the area especially if the drilling cuttings are to be buried in-situ (on-site).

A number of these chemicals are listed as hazardous and potentially hazardous and could pose a contamination threat to soil, surface water and groundwater.

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admits that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed at a licenced facility. This use of evaporation also poses a real risk to air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admits that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns.

Dan Robins, Rapid Creek NT.

Robins, Dan – Monday, 20 July 2020 – 09:05:46

Subject	TRM: Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dan Robins
Sent	7/20/2020 9:05:46 AM

Dear Department of Environment and Natural Resources,

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My key concerns with this plan are outlined below.

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Robins, Dan – Tuesday, 28 July 2020 – 10:44:40

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dan Robins
Sent	7/28/2020 10:44:40 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Dan Robins

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Dan Robins via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Dan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Dan Robins at *****.

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Robins, Robbo – Tuesday, 21 July 2020 – 18:49:18

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Robbo Robins
Sent	7/21/2020 6:49:18 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Ask the traditional owners if they want you to drill and frack thier land.

The answer will be no.

Thank you for considering my concerns,

Yours sincerely,

Robbo Rinins

Heathmere, Victoria, 3305, Australia

This email was sent by Robbo Robins via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Robbo provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Robbo Robins at *****.

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Rombouts, Maria – Monday, 20 July 2020 – 12:25:41

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Maria Rombouts
Sent	7/20/2020 12:25:41 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Impact to onsite indigenous heritage site not previously identified,
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- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Maria Rombouts via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Maria provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Maria Rombouts at *****.

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Ross, Trevor – Monday, 20 July 2020 – 19:56:25

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Trevor Ross
Sent	7/20/2020 7:56:25 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

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IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Trevor Ross

Australia

This email was sent by Trevor Ross via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Trevor provided an email address (*****) which we included in the REPLY-TO field.

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Russell, Saffron – Tuesday, 28 July 2020 – 11:12:52

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Saffron Russell
Sent	7/28/2020 11:12:52 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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WET SEASON RISKS WITH WASTE ON SITE

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DISPOSAL OF WASTE

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Saffron Russell

Araluen, Northern Territory, 0870, Australia

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Please reply to Saffron Russell at *****.

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Sagar, Colin – Monday, 20 July 2020 – 20:59:36

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Colin Sagar
Sent	7/20/2020 8:59:36 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

colin sagar

Wadbilliga, New South Wales, 2546, Australia

This email was sent by colin sagar via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however colin provided an email address (*****) which we included in the REPLY-TO field.

Please reply to colin sagar at *****.

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Sangcap, Elizabeth – Tuesday, 28 July 2020 – 15:54:32

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Elizabeth Sangcap
Sent	7/28/2020 3:54:32 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Yours sincerely,

Elizabeth Sangcap

White Gums, Northern Territory, 0870, Australia

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Sawyer, Graeme – Thursday, 30 July 2020 – 11:42:09

Subject	Comments re EMP attached
From	Graeme Sawyer
Sent	7/30/2020 11:42:09 AM

please see attached

Best regards,

Graeme Sawyer
Coordinator
Protect Country Alliance

Ph *****

***** <mailto:*****>

Attached Documents

Re: Objection to EMP 187

Thank you for the opportunity to comment on the EMP for Imperial Oil and Gas 2020 Drilling Program EP 187.

Please find below a list of concerns and suggestions for improvements that are necessary. I put forward that the EMP should be rejected by the Minister.

Chemical use is not transparent:

The water management plan is simplistic and ignores the likely problems and does not acknowledge and explain the details of items like chemicals to be used. These are supposed to be specifically listed. As an example on page 354 the words “minor chemical additives are used”. There is no way of knowing what this means and it could potentially include the use of biocides which carry safety warnings like H412 – Harmful to aquatic life with long lasting effects, or R51/53 which means Toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment. The text “Treat fluid to avoid bacteria” on page 362 would indicate biocides are to be used. The chemical list on page 349 “Appendix 12. List of Potential Chemicals in the Drilling Fluids” does not give adequate details to allow analysis of potential risks from active ingredients. Given the fact this lack of detail is specifically against the Pepper Inquiry recommendations and is a constant problem reported by fracking inquiries around the world, the EMP needs to be rejected until this significant shortcoming is addressed.

The EMP should be returned for appropriate listing of all chemicals including active constituents or it should be denied approval.

The EMP should also be returned to address issues relating to chemical use and water risks as the current document on page 134 “Activities are not expected to impact on the environmental factor”, the factor being considered is water and Stygofauna.

Given the high risks created by many of the chemicals used in fracking and the repeated issues around the globe that illustrate this risk the pepper inquiry requires clear listing of all chemicals and related processes. Item 6.3.6 “Chemicals Used chemicals will be collected in approved containers, segregated and disposed of by an approved transport provider to a licenced facility” is a woefully simplistic glossing over of these issues and again raises questions as to whether the operator

is trying to avoid the implications of this issue.

Wet season drilling and flowback treatment is inappropriate:

There are very significant risks associated with field operations in the wet season and the Pepper inquiry was clear that these risks meant operations should be limited. Since the NT government showed it was willing to ignore the essence of the recommendations in order to pander to industry, such as allowing open storage tanks for waste, we see an increasing push for operations to be allowed during the wet season.

Flowback treatment as per page 73 is not appropriate as it breaches the intent of the Pepper inquiry, doubly so in wet season periods.

Waste transport details not addressed:

We also note that the way of removing waste from the site is not specified other than using a licensed operator. If this means the waste is to be transported to QLD for disposal this is inappropriate as some possible destination sites are subject to legal challenges and may introduce serious pollutants into other watersheds.

Risks to wildlife:

Coverage of water pits with 150 by 150 mesh as per page 126 is not appropriate as small fauna will easily access the stored fluids and any chemicals. Generally the use of the term “appropriately designed” gives no confidence when issues like 150mm mesh is proposed when some of the access issues relate to small birds and other biodiversity accessing the ponds. Clearly this is not being developed in good faith with NT conditions and requirements in mind. Who is defining the term appropriate. The EMP should be returned for specific details to be provided.

This is completely inappropriate and is a clear breach of the EPBC act, the provisions relating to Ecologically Sustainable Development (ESD) and the precautionary principle . The Samuels report¹ clearly articulates the failures of Jurisdictions like the NTG to enforce the EPBC act and its embedded principles. The NT Government espouses the ESD principles as the guiding principles in its decision making in relation to the processes around fracking yet it does not implement this.

¹ Samuel, G 2020, Independent Review of the EPBC Act—Interim Report, Department of Agriculture, Water and the Environment, Canberra, June. CC BY 4.0.

Aboriginal people are expressing serious concerns:

There is a lot of concern amongst Indigenous representatives across the region and the potential impacts of fracking on their culture and the local environment. Inadequate consultation with Aboriginal people from the region impacted is one core parts of this breach. Many people express that they do not feel that there has been a genuine informed discussion with them in relation to these matters.

The Pepper Inquiry heard that the integrated nature of the elements of the environment is one of the ways in which the fracking proposals conflict with responsibilities for Country and breach the ESD principles and pose risks to the health and mental health of the community. A clear example of this is the way that the No Go zones and related exclusion principles do not take into account the catchment and feeder areas of springs and other groundwater dependent ecosystems, ignoring the integrated nature of the local environment and again breaching ESD principles.

Aboriginal people have a very sophisticated knowledge of the water systems. Throughout consultations during the Fracking Inquiry and beyond, evidence has been put that fracking and the risks to water, including the volume, flows and quality posed by the fracking process are unacceptable. There is no social licence for these activities.

A thorough scientific baseline assessment should be conducted first:

The EMP does not answer many concerns and some of these items cannot be realistically assessed until the SREBA is completed. As an example, doing EDNA sampling across the region before allowing any exploration would be a minimum first step to identify Stygofauna and other risks associated with the water systems.

“An assessment of the possibility that groundwater biodiversity (stygofauna and GDEs) may be affected by over extraction or contamination of groundwater can only be done after the recommended SREBA is completed” (Pepper Inquiry p 166) 6.3.3 on page 360.

There are a raft of questions relating to water systems and risks that do not appear to be able to be answered by NTG and so the precautionary principle should apply. As an example the plan shows that the high pressure high salinity Moroak aquifer is to be penetrated during the drilling operation.

The ecology of the area should not be put at risk:

The EMP has inconsistencies which indicate inadequate consideration of important

issues. As an example the document mentions there are patches of monsoon forest scattered across the area particularly where there are permanent springs. It then goes on to claim the exploration area has a low potential for Terrestrial Groundwater Dependent Environments, yet they are not sure where they will actually drill the well. This appears to be speculative and should not be allowed to proceed until much greater clarity can be provided.

These statements are not compatible, as Monsoon Forest is groundwater dependent and vitally important refuge sites for Biodiversity. The roles and types of refuges, whether they are evolutionary or ecological refuges should be considered in more detail and used as a part of the decision making process and possible no go zone exclusions applied to monsoon forests and springs in such habitats.

The role of the refuge areas is critical for biodiversity² in the semi-arid areas these places are vital to the long term survival of species. The Plan is inadequate as it has not given appropriate consideration to the issues and needs to address these issues before any approval could be contemplated. This is especially the case when the actual well location is uncertain.

Much of the area discussed is data deficient in relation to biodiversity and water issues and these urgently need to be studied. In times of Biodiversity crisis it is not appropriate for approvals to be given until these deficiencies can be met.

There are likely to be a number of species in the areas that have not been listed. The habitats contain many of the features to support species that are found in other locations of a similar nature. Some of these species such as Varanus Mitchellii and species of land snails are endangered. It is not appropriate to dismiss these issues because of significant data deficiencies in the records from the area.

The uncertainty of the drilling location means that an informed assessment cannot be made in advance and Imperial must be made to revisit these issues once they have determined the exact location. There is a strong likelihood that water removed from the systems will impact on springs and flows.

Associated Water:

There are other claims in the EMP which are not supported by the facts and suggest an attempt to ignore potentially important issues. One such example is that Imperial claims there is no expectation of water being produced during drilling.

² Davis, J., Pavlova A., Thompson, R., & Sunnucks, P., (2013) Evolutionary refugia and ecological refuges: key concepts for conserving Australian arid zone freshwater biodiversity under climate change, *Global Change Biology* 19 1970–1984

“Due to well designs and the use of overbalanced drilling, water is not expected to be produced during drilling. The potential for associated water to flow to surface would be managed with the use of the overbalanced drilling fluid (water-based mud).”

This position may not be so black and white in reality, given the previous examples of other wells in the region and the existence of high pressure systems such as the Moroak underlying the area. As an example the log reports from Ronald 1 shows water issues and extreme salinity of 118000 ppm. “The well did begin producing water in the latter stages of drilling, requiring the water to be unloaded on each connection”.

Further correspondence with the EPA and the fracking taskforce confirms a flowback event at the Tanubirini well on August 23 2014.

In correspondence with Minister Lawler, the Minister acknowledged viii that the departments responsible did not know the salinity or pressure in the Moroak, even as she approved the drilling of wells through the system. Issues relating to the implications of this Hypersaline system and its pressure need to be resolved before allowing drilling to proceed through this system in the Mcarthur basin. The EMP must be delayed until this matter is resolved.

Water risks due to corrosion:

There are enormous risks in association with well failure and the chemicals and their short and long term risks. Well failures, corrosion, the pressure and salinity in the Moroak sandstone layer and the associated heat and hypersalinity which are corrosion risks but also risk mixing this saline layer with beneficial layers are all very specific risks that need addressing.

With this Hypersaline and heated Moroak system being in contact with the well piping there is a severe corrosion risk. When the pipes eventually fail the pressure in the Moroak will push saltwater, chemicals and other pollutants into other areas of the underground systems. There is potential for the hypersaline Moroak system to be connected to the beneficial freshwater systems with devastating implications.

The issues of corrosive bacteria such as that noted ³ is of further concern and also needs to be addressed. The proponent is using biocides because the corrosion

³<https://web.archive.org/web/20190328182110/https://www.einpresswire.com/article/480473562/xpandable-patches-to-extend-the-life-of-corroded-csg-wells-in-queensland-australia>

causing sulphide reducing bacteria are present. They have no capability to control the bacteria on the outside of the well casing which will lead to corrosion like that indicated in the SALTEL case (Footnote 3).

There is a high risk of these corrosive bacteria impacting on the concrete and steel systems over time. The concrete provides food for these organisms and the by-product of their activity is acid which dissolves concrete and corrodes steel, even stainless alloys.

With hot hypersaline pressurised systems at depth causing corrosion risk and bacteria causing corrosion at shallow depth in aquifers the precautionary principle within the EPBC act and the ESD provisions of it, along with the ESD provisions in NT Government fracking policies, requires that the EMP be stopped.

The EMP in its current form should be rejected:

In light of the less than adequate information, and the key components of the hydraulic fracturing operations missing from this plan, we recommend the Minister enacts the power of the Petroleum (Environment) Regulations Division 2 to request more information and issue a resubmission notice for a full EMP by Imperial, or just not approve the EMP.

The EMP is lacking in many areas and cannot be approved in its current form. This is an obvious example of where the Pepper Inquiry highlighted the risks of the deficiencies in data and knowledge about the biodiversity and water systems in the region. The inquiry indicated that the SREBA was required to address this deficiency but in the meantime, it is essential that the precautionary principle be applied and caution taken with decision making. Some examples from the Pepper inquiry report illustrate this issue of how significant knowledge gaps impeded “the ability to properly assess the risks of any shale gas development.

The wastewater monitoring mentioned needs to be much more explicitly described as there is no confidence that the operator has any intention or capacity of implementing such a plan as outlined. Nor is there likely to be any monitoring of this by the NT Government. it is inadequate to indicate that monitoring will occur and if problems are found remediation deterrents will be implemented. Many of the interactions with water could be nocturnal in the case of frogs or fleeting as in the case of bird species.

The impacts of the chemicals may not be immediately obvious at the site or they may cause more subtle impacts like infertility as indicated in some research about fracking

activities in the US (E.g Pennsylvania Grand Jury report 2020). Items like “Wastewater tanks do not contain tailing beaches or perches, reducing the ability for most birds to land and drink from tanks” is simplistic and does not account for many bird species which use dip bathing rather than perching. Further just below this item, still within dot point 6.3.3 the item “Fauna ladders and/or bird islands will be installed at the wastewater treatment tanks” is completely at odds with the previous item. Again the simplistic nature of these responses indicates the operator is either not being serious about the issues or is not able to address these issues. The EMP should be rejected until these inadequacies and inconsistencies are addressed.

Yours truly,

Graeme Sawyer
Protect Country Alliance
Mobile 0411881378

Sawyer, Nalani – Friday, 24 July 2020 – 17:02:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Nalani Sawyer
Sent	7/24/2020 5:02:30 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Nalani Sawyer

Millner, Northern Territory, 0810, Australia

This email was sent by Nalani Sawyer via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Nalani provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Nalani Sawyer at *****.

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Schaffer, Maureen – Monday, 20 July 2020 – 11:14:28

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Maureen Schaffer
Sent	7/20/2020 11:14:28 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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Thank you for considering my concerns,

Yours sincerely,

Maureen Schaffer

Muirhead, Northern Territory, 0810, Australia

This email was sent by Maureen Schaffer via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Maureen provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Maureen Schaffer at *****.

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Schahinger, Dianne – Tuesday, 28 July 2020 – 15:37:01

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dianne Schahinger
Sent	7/28/2020 3:37:01 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not

only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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Thank you for considering my concerns,

Yours sincerely,
Dianne Schahinger
Christie Downs, South Australia, 5164, Australia

This email was sent by Dianne Schahinger via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Dianne provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Dianne Schahinger at *****.

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Schlicht, Justine – Thursday, 30 July 2020 – 12:56:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Justine Schlicht
Sent	7/30/2020 12:56:30 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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Thank you for considering my concerns,

Yours sincerely,

Justine Schlicht

This email was sent by Justine Schlicht via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Justine provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Justine Schlicht at *****.

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Schlunke, Elli – Friday, 24 July 2020 – 15:19:49

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Elli Schlunke
Sent	7/24/2020 3:19:49 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

Yours sincerely,

Elli Schlunke

Obi Obi, Queensland, 4574, Australia

This email was sent by Elli Schlunke via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Elli provided an email address (*****) which we included in the REPLY-TO field.

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Schultz, Kristy – Monday, 20 July 2020 – 19:35:18

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kristy Schultz
Sent	7/20/2020 7:35:18 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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IMPACTS TO PEOPLE AND COMMUNITIES

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- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Kristy Schultz

Marrara, Northern Territory, 0812, Australia

This email was sent by Kristy Schultz via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Kristy provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Kristy Schultz at *****.

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Schultz, Rosalie – Tuesday, 28 July 2020 – 18:52:09

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Rosalie Schultz
Sent	7/28/2020 6:52:09 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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Thank you for considering my concerns,

Yours sincerely,

Rosalie Schultz

White Gums, Northern Territory, 0870, Australia

This email was sent by Rosalie Schultz via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Rosalie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Rosalie Schultz at *****.

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Seymour, Frankie – Tuesday, 28 July 2020 – 10:15:50

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Frankie Seymour
Sent	7/28/2020 10:15:50 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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only could this kill birds, but extreme weather events could cause downstream pollution impacts.

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Thank you for considering my concerns,

Yours sincerely,
Frankie Seymour
New South Wales, 2620, Australia

This email was sent by Frankie Seymour via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Frankie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Frankie Seymour at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Shepherd, Louise – Tuesday, 21 July 2020 – 06:16:52

Subject	NO to fracking!
From	Louise Shepherd
Sent	7/21/2020 6:16:52 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Yours sincerely,

Louise Shepherd

Flagstaff Hill, South Australia, 5159, Australia

This email was sent by Louise Shepherd via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Louise provided an email address (*****) which we included in the REPLY-TO field.

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Sheridan, Teena – Tuesday, 28 July 2020 – 10:31:48

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Teena Sheridan
Sent	7/28/2020 10:31:48 AM

Dear Department of Environment and Natural Resources,

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Teena Sheridan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Teena provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Teena Sheridan at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Shields, Annette – Thursday, 30 July 2020 – 15:43:50

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Annette Shields
Sent	7/30/2020 3:43:50 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Annette Shields

Clontarf, Queensland, 4019, Australia

This email was sent by Annette Shields via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Annette provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Annette Shields at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Simons, Rob – Friday, 31 July 2020 – 16:56:24

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Rob Simons
Sent	7/31/2020 4:56:24 PM

Dear Department of Environment and Natural Resources,

I have visited sites near Narrabri and observed first hand the damage done by CSG drilling and can't imagine what will happen during a wet season in the NT.

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Rob Simons

Guildford, Victoria, 3451, Australia

This email was sent by Rob Simons via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Rob provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Rob Simons at *****.

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SIRIANNI, Dianne – Thursday, 30 July 2020 – 16:36:08

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dianne SIRIANNI
Sent	7/30/2020 4:36:08 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Yours sincerely,
Dianne SIRIANNI

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Please reply to Dianne SIRIANNI at *****.

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Smith, Gayle – Thursday, 30 July 2020 – 19:09:19

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Gayle Smith
Sent	7/30/2020 7:09:19 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

Yours sincerely,
Gayle Smith
Nightcliff, Northern Territory, 0810, Australia

This email was sent by Gayle Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Gayle provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Gayle Smith at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Smith, Jock – Friday, 24 July 2020 – 08:01:51

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jock Smith
Sent	7/24/2020 8:01:51 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jock Smith

Mount Byron, Queensland, 4312, Australia

This email was sent by Jock Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jock provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jock Smith at *****.

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Smith, John – Thursday, 30 July 2020 – 17:23:38

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	John Smith
Sent	7/30/2020 5:23:38 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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Thank you for considering my concerns,

Yours sincerely,

John Smith

Guildford, Victoria, 3451, Australia

This email was sent by John Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however John provided an email address (*****) which we included in the REPLY-TO field.

Please reply to John Smith at *****.

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Smith, Judy – Monday, 20 July 2020 – 12:43:14

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Judy Smith
Sent	7/20/2020 12:43:14 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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Thank you for considering my concerns,

Yours sincerely,

Judy Smith

Thrumster, New South Wales, 2444, Australia

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Smith, Sherree – Friday, 31 July 2020 – 14:50:20

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sherree Smith
Sent	7/31/2020 2:50:20 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Yours sincerely,

Sherree Smith

Nightcliff, Northern Territory, 0810, Australia

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Smith, Sue – Tuesday, 28 July 2020 – 10:36:08

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sue Smith
Sent	7/28/2020 10:36:08 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Sue Smith

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Sue Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sue provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sue Smith at *****.

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Sometimes, Beth – Tuesday, 21 July 2020 – 09:16:17

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Beth Sometimes
Sent	7/21/2020 9:16:17 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Beth Sometimes

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Please reply to Beth Sometimes at *****.

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Sorensen, Deb – Wednesday, 22 July 2020 – 19:02:11

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Deb Sorensen
Sent	7/22/2020 7:02:11 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Deb Sorensen

Wyong, New South Wales, 2259, Australia

This email was sent by Deb Sorensen via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Deb provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Deb Sorensen at *****.

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Srbinovski, Jo – Thursday, 23 July 2020 – 17:46:35

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jo Srbinovski
Sent	7/23/2020 5:46:35 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
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- Light pollution due to artificial lighting required for safe operations,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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- Produced water which could include naturally occurring radioactive materials
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jo Srbinovski

This email was sent by Jo Srbinovski via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jo provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jo Srbinovski at *****.

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Sri, Anna – Monday, 20 July 2020 – 20:13:01

Subject	Imperial Oil and Gas EP 187 - Drilling During Critical Wet Season
From	Anna Sri
Sent	7/20/2020 8:13:01 PM

Dear Department of Environment and Natural Resources,

I am a veterinarian and public health practitioner. I am currently living in Queensland however I was also living and working in Darwin and the Roper Gulf Region last year. I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- * Increased potential for accidents and damage to infrastructure due to vehicle movements,
- * Impact to onsite Indigenous heritage sites not previously identified,
- * Soil biodiversity impact due to heavy machinery movements,
- * Increased severity of flooding impacts from land clearing and drilling activities,
- * Noise and vibration due to vehicles movements, civil works and drilling activities,
- * Light pollution due to artificial lighting required for safe operations,
- * Disturbance to heritage sites due to works conducted out of the approved areas.
- * Road users and landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

Using open pits and unattended open-top tanks in the wet season is completely irresponsible and unacceptable given the high risk of contamination of surrounding lands, impacts on wildlife and even human health. These open pits may contain heavy metals, naturally occurring radioactive materials and other harmful chemicals.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

As you would be well aware, the wet season brings rain and cyclones. During this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

It is anticipated that 2.5ML of water will be required for Imperial Oil and Gas’ drilling activities.

A number of negative impacts to water are posed by Imperial’s drilling program including:

- * Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- * Impact to hydrological systems due to chemical spills, oil and chemical handling,
- * Contamination of water bodies due to storage (tank/vessels) failure,
- * Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria. The Glyde is the main tributary to the McArthur River and lies to the east of the study area.

The Chambers River Formation and Cambrian Limestone provide regional scale aquifers for groundwater resources available for pastoral enterprises, domestic bores at homesteads and town water supplies for several remote communities across the region.

Among the various formations to be intersected during drilling, the Gum Ridge Aquifer is expected to be encountered at an approximate depth of *****m.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However it is well known that cement will crack overtime and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Please contact me again once these concerns have been addressed.

Kind regards,

Dr Anna Sri BVSc (Hons) MPH

Stanton, Meredith – Wednesday, 29 July 2020 – 04:50:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Meredith Stanton
Sent	7/29/2020 4:50:26 AM

Dear Department of Environment and Natural Resources,

I object to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

I live on the northern rivers of NSW, where onshore gas company Metgasco attempted to develop a toxic and invasive coal seam gas industry on an unwilling community, who rightly opposed the industrialisation and degradation of the local landscape and potential risks to water quality and availability.

I have travelled twice to the territory on holiday and consider the country too precious to risk polluting the water and met the people who are too beautiful to impose this invasive mining development into top end communities.

There is nothing beneficial that gas mining brings for the local community. The invasive drilling of gas wells risks polluting local water sources, leaving a toxic legacy of harm for future generations as ageing infrastructure deteriorates, leaving taxpayers the costs of repairing leaky well heads and corroding well casings - a legacy long after the gas companies have made their profits and left the area in search of a new gas field.

Extending the exploratory gas drilling program into the top end wet season is asking for problems to occur, as heavy rainfall events disrupt work sites and add risks to workers, water and local erosion of landscapes.

Vehicle movements and heavy machinery will impact road surfaces and spread invasive weeds. Out of area contractors will not respect local cultural heritage and risk bringing coronavirus and other harmful pathogens into the natural landscape.

The development of gasfields across Queensland has been plagued with poor regulation, and inconvenience for landholders as pipelines and earthworks disrupt stock management and water run off. Company gas and pipeline workers are coming and going day and night, leaving gates open and cutting fences to create havoc for farmers.

Most of the jobs created will be for skilled workers, and the few local people employed will be recruited away from other local business and seasonal work, disrupting worker availability for existing enterprises.

These mining companies only plan for profits and it is well documented that boom and bust cycles impact local community cohesion negatively, with just a few existing businesses benefiting from increased sales and services.

The promises come thick and fast, but the benefits do not flow to everyone with those negatively impacted never factored into the equation.

I have a number of concerns about this plan, my key points are outlined below.

NEGATIVE IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: "enclosed tanks must be used to hold all wastewater."

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and

testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial's drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use "a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers". However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Please limit any drilling plans to the dry season, with strict adherence to best practice methods, removing all toxic waste off site and full rehabilitation of drill sites as a mandatory condition of approval.

Thank you for the opportunity to comment.

Yours sincerely,

Meredith Stanton

Dorrigo, New South Wales, 2453, Australia

This email was sent by Meredith Stanton via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Meredith provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Meredith Stanton at *****.

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Stark, Lachlan – Monday, 20 July 2020 – 21:31:01

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Lachlan Stark
Sent	7/20/2020 9:31:01 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

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IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Lachlan Stark

Darwin DC, Northern Territory, 0820, Australia

This email was sent by Lachlan Stark via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Lachlan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Lachlan Stark at *****.

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Steele, Kerrie – Tuesday, 21 July 2020 – 15:50:42

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kerrie Steele
Sent	7/21/2020 3:50:42 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

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IMPACTS TO AIR QUALITY

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Kerrie Steele

Tarrawanna, New South Wales, 2518, Australia

This email was sent by Kerrie Steele via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Kerrie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Kerrie Steele at *****.

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Steinborner, Naomi – Tuesday, 21 July 2020 – 21:22:07

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Naomi Steinborner
Sent	7/21/2020 9:22:07 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can

rehabilitate these sites their drilling program should not proceed. You can't turn this around when the damage is done. It is devastating to think of the impacts to communities, environment, birds and animals.

Thank you for considering my concerns,

Yours sincerely,

Naomi Steinborner

Red Rock, New South Wales, 2456, Australia

This email was sent by Naomi Steinborner via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Naomi provided an email address (*****) which we included in the REPLY-TO field.

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Stepic, Deni – Monday, 20 July 2020 – 13:25:31

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Deni Stepic
Sent	7/20/2020 1:25:31 PM

Dear Department of Environment and Natural Resources,

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Deni Stepic

This email was sent by Deni Stepic via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Deni provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Deni Stepic at *****.

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Stevenson, Margaret – Tuesday, 28 July 2020 – 14:07:35

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Margaret Stevenson
Sent	7/28/2020 2:07:35 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Margaret Stevenson

PO Box 2478, Northern Territory, 0871, Australia

This email was sent by Margaret Stevenson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Margaret provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Margaret Stevenson at *****.

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Stewart, Sarah – Monday, 20 July 2020 – 22:13:45

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Sarah Stewart
Sent	7/20/2020 10:13:45 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Sarah Stewart

Watertown, Massachusetts, 02472, United States

This email was sent by Sarah Stewart via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Sarah provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Sarah Stewart at *****.

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Stomann, Katrina – Wednesday, 22 July 2020 – 09:04:30

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Katrina Stomann
Sent	7/22/2020 9:04:30 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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Thank you for considering my concerns,

Yours sincerely,

Katrina Stomann

10 Munro Street, McMahons Point, NSW, 2060, Australia

This email was sent by Katrina Stomann via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Katrina provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Katrina Stomann at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Storey, Evelyn – Friday, 31 July 2020 – 15:11:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Evelyn Storey
Sent	7/31/2020 3:11:26 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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Thank you for considering my concerns,

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Please reply to Evelyn Storey at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Story, Jasmine – Tuesday, 21 July 2020 – 15:58:47

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jasmine Story
Sent	7/21/2020 3:58:47 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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THREATENED SPECIES IN THE AREA

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

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- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jasmine Story

This email was sent by Jasmine Story via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jasmine provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jasmine Story at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Robertson, Peter – Monday, 20 July 2020 – 10:44:00

From: peter robertson <***** <mailto:*****> >
Sent: Monday, 20 July 2020 10:44 AM
To: ntepa epa <***** <mailto:*****> >
Subject: Failure to advertise fracking EMP consultations on EPA website

Dear EPA

It is very devious and another breach of public trust that the NT EPA does not advertise on its 'consultation hub ' the onshore gas EMPs that are open for public comment.

Regardless of whether the EPA itself is leading the consultation, it is obviously a key area of public interest in environmental assessment and consultation which the EPA should (a) advertise and (b) provide a pathway for input.

Please immediately commence listing onshore gas EMPs open for public consultation on the EPA website and provide a link to the relevant consultation documentation.

Please let me know that this has been done, or if not, why not.

Thank you.

Peter Robertson

The Gardens

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The clearest way into the universe is through a forest wilderness. (John Muir)

Let's grow natives not weeds!: <http://www.growmeinstead.com.au/>

Attached Documents

Sullivan, Terry – Thursday, 30 July 2020 – 21:13:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Terry Sullivan
Sent	7/30/2020 9:13:39 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Terry Sullivan

This email was sent by Terry Sullivan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Terry provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Terry Sullivan at *****.

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Sweetlove, Bethan – Wednesday, 22 July 2020 – 14:30:24

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Bethan Sweetlove
Sent	7/22/2020 2:30:24 PM

Dear Department of Environment and Natural Resources,

I am writing to express my grave concern and objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

As an NT resident, the impact of these activities are enormously concerning. Please find below a comprehensive summary of concerns, compiled by Lock the Gate, and offer a personal response to my email address relating to each significant risk.

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Bethan Sweetlove

Alice Springs, Northern Territory, 0870, Australia

This email was sent by Bethan Sweetlove via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Bethan provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Bethan Sweetlove at *****.

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Tait, Lillian – Tuesday, 28 July 2020 – 10:03:35

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Lillian Tait
Sent	7/28/2020 10:03:35 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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Yours sincerely,

Lillian Tait

Emungalan, Northern Territory, 0850, Australia

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Tanner, Dennis – Wednesday, 22 July 2020 – 08:31:40

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dennis Tanner
Sent	7/22/2020 8:31:40 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address

this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,
dennis tanner
Green Hills, New South Wales, 2323, Australia

This email was sent by dennis tanner via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however dennis provided an email address (*****) which we included in the REPLY-TO field.

Please reply to dennis tanner at *****.

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Tapp, Donna – Monday, 20 July 2020 – 10:59:48

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Donna Tapp
Sent	7/20/2020 10:59:48 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

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Thank you for considering my concerns,

Yours sincerely,

Donna Tapp

Howard Springs, Northern Territory, 0835, Australia

This email was sent by Donna Tapp via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Donna provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Donna Tapp at *****.

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Taylor, Kath – Tuesday, 21 July 2020 – 10:51:44

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kath Taylor
Sent	7/21/2020 10:51:44 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Kath Taylor

Mullaloo, Western Australia, 6027, Australia

This email was sent by Kath Taylor via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Kath provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Kath Taylor at *****.

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Tepper, – Tuesday, 21 July 2020 – 22:41:43

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Valerie Tepper
Sent	7/21/2020 10:41:43 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Thank you for considering my concerns,

Yours sincerely,

Valerie Tepper

Doreen, Victoria, 3754, Australia

This email was sent by Valerie Tepper via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Valerie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Valerie Tepper at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Thomas, Robin – Friday, 24 July 2020 – 08:39:59

Subject	Objection to the Imperial Oil and Gas wet season drilling program EP 187
From	Robin Thomas
Sent	7/24/2020 8:39:59 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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Thank you for considering my concerns,

Yours sincerely,

Robin & Einion Thomas

New South Wales, 2469, Australia

This email was sent by Robin Thomas via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Robin provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Robin Thomas at *****.

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Thorn, Jane – Monday, 27 July 2020 – 08:26:17

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jane Thorn
Sent	7/27/2020 8:26:17 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Jane Thorn

Marrara, Northern Territory, 0812, Australia

This email was sent by Jane Thorn via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jane provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jane Thorn at *****.

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Thyne, Jill – Tuesday, 28 July 2020 – 22:06:38

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jill Thyne
Sent	7/28/2020 10:06:38 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

Yours sincerely,

Jill Thyne

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Jill Thyne via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jill provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jill Thyne at *****.

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Tinsley, Heather – Tuesday, 28 July 2020 – 10:44:52

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Heather Tinsley
Sent	7/28/2020 10:44:52 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,
Heather Tinsley
Adelaide, South Australia, 5000, Australia

This email was sent by Heather Tinsley via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Heather provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Heather Tinsley at *****.

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Tobin, Liza – Tuesday, 28 July 2020 – 10:15:41

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Liza Tobin
Sent	7/28/2020 10:15:41 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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WET SEASON RISKS WITH WASTE ON SITE

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Yours sincerely,

Liza Tobin

Rum Jungle, Northern Territory, 0822, Australia

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Togni, Liz – Thursday, 23 July 2020 – 20:09:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Liz Togni
Sent	7/23/2020 8:09:26 PM

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Liz Togni

This email was sent by Liz Togni via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Liz provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Liz Togni at *****.

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Tonkin, Allen – Monday, 20 July 2020 – 12:46:57

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Allen Tonkin
Sent	7/20/2020 12:46:57 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Allen Tonkin

Spencers Brook, Western Australia, 6401, Australia

This email was sent by Allen Tonkin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Allen provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Allen Tonkin at *****.

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Townsend, Lorraine – Monday, 20 July 2020 – 10:39:16

Subject	TRM: Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Lorraine Townsend
Sent	7/20/2020 10:39:16 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Lorraine Townsend

Wangi Wangi, New South Wales, 2267, Australia

This email was sent by Lorraine Townsend via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Lorraine provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Lorraine Townsend at *****.

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Trappmann, Bernie – Tuesday, 21 July 2020 – 03:22:21

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Bernie Trappmann
Sent	7/21/2020 3:22:21 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

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Thank you for considering my concerns,

Yours sincerely,

Bernie Trappmann

Moulden, Northern Territory, 0830, Australia

This email was sent by Bernie Trappmann via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Bernie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Bernie Trappmann at *****.

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Tredgett, Lorna – Friday, 31 July 2020 – 16:53:49

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Lorna Tredgett
Sent	7/31/2020 4:53:49 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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Thank you for considering my concerns,

Yours sincerely,

Lorna Tredgett

Mitchell, Northern Territory, 0832, Australia

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Please reply to Lorna Tredgett at *****.

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Tucker, Kym – Thursday, 23 July 2020 – 16:03:53

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Kym Tucker
Sent	7/23/2020 4:03:53 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

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Please reply to Kym Tucker at *****.

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Turner, Margie – Monday, 20 July 2020 – 20:29:28

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Margie Turner
Sent	7/20/2020 8:29:28 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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THREATENED SPECIES IN THE AREA

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- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Margie Turner

Girraween, Northern Territory, 0836, Australia

This email was sent by Margie Turner via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Margie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Margie Turner at *****.

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Vandermark, Jo – Wednesday, 29 July 2020 – 15:56:42

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jo Vandermark
Sent	7/29/2020 3:56:42 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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REHABILITATION CONSIDERATIONS

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Thank you for considering my concerns,

This email was sent by Jo Vandermark via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Jo provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Jo Vandermark at *****.

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Verellen, Nathalie – Monday, 20 July 2020 – 16:59:53

Subject	Objection : Imperial Oil and Gas wet season drilling program EP 187
From	Nathalie Verellen
Sent	7/20/2020 4:59:53 PM

Attention : Department of Environment and Natural Resources,

I am writing to express my objection to the above mentioned program.

Some of my reasons are :

- Real risk of pollution and contamination due to the use of open pit water storage. This has huge implication on the natural environment and wildlife
- contamination due to poisonous substances such as heavy metals
- irresponsible disposal of toxic waste
- there is no protection for 13 threatened species
- impacts on groundwater such as chemical spills, pollution and management
- air quality, noise pollution
- impact on local communities, farms and stock

Wet season drilling is an irresponsible practise which will lead to unreparable damage to the environment.

We have to ask ourselves, is this worth it to drill for more gas. Do we need more gas? Who will benefit. The big corporations or is this to benefit the Australian people. The truth is NO. It does not serve Australia.

Please, there is enough evidence that the project is doomed.

I strongly object to it!

I hope you take my concerns into consideration.

Thank you.

Nathalie Verellen

This email was sent by Nathalie Verellen via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Nathalie provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Nathalie Verellen at *****.

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Villegas, Patricia – Thursday, 30 July 2020 – 10:20:31

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Patricia Villegas
Sent	7/30/2020 10:20:31 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Patricia Villegas

Clifton Beach, Queensland, 4879, Australia

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Please reply to Patricia Villegas at *****.

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Voulanas, Steve – Friday, 31 July 2020 – 16:01:22

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Steve Voulanas
Sent	7/31/2020 4:01:22 PM

Dear Department of Environment and Natural Resources,

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USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Steve Voulanas

Marrara, Northern Territory, 0812, Australia

This email was sent by Steve Voulanas via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Steve provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Steve Voulanas at *****.

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Waites, Dominique – Thursday, 23 July 2020 – 14:56:53

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dominique Waites
Sent	7/23/2020 2:56:53 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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Thank you for considering my concerns,

Yours sincerely,

Dominique Waites

Broken Hill West, New South Wales, 2880, Australia

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Please reply to Dominique Waites at *****.

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Walker, Alison – Friday, 24 July 2020 – 11:14:29

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Alison Walker
Sent	7/24/2020 11:14:29 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Alison Walker

Darwin DC, Northern Territory, 0820, Australia

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Please reply to Alison Walker at *****.

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Wallace, Catherine – Saturday, 25 July 2020 – 17:49:05

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Catherine Wallace
Sent	7/25/2020 5:49:05 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Yours sincerely,

Catherine Wallace

Mount Eliza, Victoria, 3930, Australia

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Walter, Charles – Friday, 31 July 2020 – 06:55:59

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Charles Walter
Sent	7/31/2020 6:55:59 AM

Dear Department of Environment and Natural Resources,

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- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Charles Walter via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Charles provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Charles Walter at *****.

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Warburton, Graham – Monday, 20 July 2020 – 16:33:05

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Graham Warburton
Sent	7/20/2020 4:33:05 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Graham Warburton

Darawank, New South Wales, 2428, Australia

This email was sent by Graham Warburton via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Graham provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Graham Warburton at *****.

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Wasson, Dorothy – Wednesday, 22 July 2020 – 18:21:42

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dorothy Wasson
Sent	7/22/2020 6:21:42 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

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WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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IMPACTS UPON GROUNDWATER AND SURFACE WATER

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- Impact to surface water due to inappropriate management of waste

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Dorothy Wasson

New South Wales, 2340, Australia

This email was sent by Dorothy Wasson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Dorothy provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Dorothy Wasson at *****.

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Watson, Adele – Tuesday, 21 July 2020 – 06:44:56

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Adele Watson
Sent	7/21/2020 6:44:56 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Adele Watson

Gumdale, Queensland, 4154, Australia

This email was sent by Adele Watson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Adele provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Adele Watson at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Waud, Leon – Wednesday, 29 July 2020 – 15:38:12

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Leon Waud
Sent	7/29/2020 3:38:12 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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Thank you for considering my concerns,

Yours sincerely,

Leon Waud

Nightcliff, Northern Territory, 0810, Australia

This email was sent by Leon Waud via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Leon provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Leon Waud at *****.

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Wilding, Louise – Wednesday, 22 July 2020 – 20:10:40

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Louise Wilding
Sent	7/22/2020 8:10:40 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

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USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Louise Wilding

Merrylands, New South Wales, 2160, Australia

This email was sent by Louise Wilding via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Louise provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Louise Wilding at *****.

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Wileman, Mike – Thursday, 30 July 2020 – 09:38:46

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Mike Wileman
Sent	7/30/2020 9:38:46 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

M Wileman

Darwin DC, Northern Territory, 0820, Australia

This email was sent by Mike Wileman via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Mike provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Mike Wileman at *****.

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Wiles, Cass – Friday, 31 July 2020 – 13:58:33

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Cass Wiles
Sent	7/31/2020 1:58:33 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Cass Wiles

Sadadeen, Northern Territory, 0870, Australia

This email was sent by Cass Wiles via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Cass provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Cass Wiles at *****.

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Williams, Carmel – Wednesday, 22 July 2020 – 00:14:13

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Carmel Williams
Sent	7/22/2020 12:14:13 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

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Thank you for considering my concerns,

Yours sincerely,

Carmel Williams

59 Beaumont Street,

Camooweal, Queensland, 4828, Australia

This email was sent by Carmel Williams via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Carmel provided an email address (*****) which we included in the REPLY-TO field.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

Williams, Claire – Monday, 20 July 2020 – 11:24:18

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Claire Williams
Sent	7/20/2020 11:24:18 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

Nothing is more important than our environment. Do the right thing. Honour the land. Do the right thing by your children. Let history judge you well.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
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- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Claire Williams

Bar Beach, New South Wales, 2300, Australia

This email was sent by Claire Williams via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Claire provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Claire Williams at *****.

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Williams, Dawn – Friday, 31 July 2020 – 15:57:45

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Dawn Williams
Sent	7/31/2020 3:57:45 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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TRANSPORT RISKS AND TOURISM IMPACTS

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BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Dawn Williams

Walliebum, Queensland, 4655, Australia

This email was sent by Dawn Williams via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Dawn provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Dawn Williams at *****.

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Willis, Susana – Tuesday, 21 July 2020 – 18:50:13

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Susana Willis
Sent	7/21/2020 6:50:13 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Susana Willis

Woy Woy Bay, New South Wales, 2256, Australia

This email was sent by Susana Willis via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Susana provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Susana Willis at *****.

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Wilson, L – Friday, 31 July 2020 – 15:21:55

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	L Wilson
Sent	7/31/2020 3:21:55 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

Creating more stranded assets in Australia, unsupported by the world at large and certainly not by underwriters, give us reason to turn away from these projects favouring renewables.

The Paris Protocol has changed the need for oil and gas exploration, preferring companies to reduce their Carbon emissions, a factor blatantly overspent by the Oil and Gas industry and assisting in bringing the Earth, if not to the brink of environmental collapse, then to significantly costly remedial solutions, that are unlikely to be undertaken in the event of a company collapse.

(20 million stranded full ocean tankers during the COVID-19 lockdown is a strong deterrent to more of the same problem, and a need for a system of land and mining change.)

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits may be full of heavy metals, biocides and naturally occurring radioactive materials.

I understand that by using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal? The idea of this is an environmental disaster in the making. These issues are not new to the oil and gas industry, with it ignoring the Emissions reduction targets that Australia and its companies must comply with as it honours its Paris Protocol to bring down global warming by 1.5 degrees C.

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial's drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria. This

Imperial Oil and Gas state that they will use "a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow aquifers". However, it is well known that cement will crack over time and this would be disastrous.

I understand there may be insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it's wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
- Drilling fluids which include toxic biocides
- Drilling cuttings which could include naturally occurring radioactive materials
- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

I understand that Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.", and that this may be a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory's tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that "In the event of produced gas, flaring rather than venting will be implemented for emergency purposes." Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have "no specific considerations" for rehabilitation regarding the well site or access to well site. This is not good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

L Wilson

Mount Macedon, Victoria, 3441, Australia

This email was sent by L Wilson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however L provided an email address (*****) which we included in the REPLY-TO field.

Please reply to L Wilson at *****.

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Wiseman, Marianne – Wednesday, 22 July 2020 – 09:40:26

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Marianne Wiseman
Sent	7/22/2020 9:40:26 AM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

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The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

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Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

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- Produced water which could include naturally occurring radioactive materials
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IMPACTS TO AIR QUALITY

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

This email was sent by Marianne Wiseman via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Marianne provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Marianne Wiseman at *****.

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To learn more about web protocol RFC 3834 visit: <https://tools.ietf.org/html/rfc3834>

WITTE, MARGARET – Monday, 20 July 2020 – 18:08:15

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	MARGARET DE WITTE
Sent	7/20/2020 6:08:15 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

aquifers”. However, it is well known that cement will crack over time and this would be disastrous.

There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

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Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

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Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

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REHABILITATION CONSIDERATIONS

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good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

MARGARET DE WITTE

Urunga, New South Wales, 2455, Australia

This email was sent by MARGARET DE WITTE via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however MARGARET provided an email address (*****) which we included in the REPLY-TO field.

Please reply to MARGARET DE WITTE at *****.

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Woodham, Eric – Tuesday, 28 July 2020 – 20:25:25

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Eric Woodham
Sent	7/28/2020 8:25:25 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

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Thank you for considering my concerns,

Yours sincerely,

Eric Woodham

Deeral, Queensland, 4871, Australia

This email was sent by Eric Woodham via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Eric provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Eric Woodham at *****.

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Wormworth, Janice – Wednesday, 22 July 2020 – 21:06:09

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Janice Wormworth
Sent	7/22/2020 9:06:09 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

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There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

Imperial Oil and Gas state that they will use “a cemented production casing string to provide additional protection barrier between producing hydrocarbon bearing zones and shallow

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Thank you for considering my concerns,

Yours sincerely,

Janice Wormworth

This email was sent by Janice Wormworth via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Janice provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Janice Wormworth at *****.

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Worrall, Amanda – Monday, 20 July 2020 – 12:22:39

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Amanda Worrall
Sent	7/20/2020 12:22:39 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

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These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

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The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

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Yours sincerely,

Amanda Worrall

This email was sent by Amanda Worrall via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Amanda provided an email address (*****) which we included in the REPLY-TO field.

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Young, Carmel – Wednesday, 22 July 2020 – 18:30:07

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Carmel Young
Sent	7/22/2020 6:30:07 PM

Dear Department of Environment and Natural Resources,

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There is insufficient information concerning Groundwater Dependent Ecosystems in the Beetaloo Sub-basin or elsewhere in the NT. The Strategic Regional Environmental and Baseline Assessment recommended in Section 7.4.3 of the Pepper Inquiry seeks to address this knowledge gap. The SREBA has still not been finalised. Until the SREBA is finalised this drilling program should not proceed.

CHEMICAL AND DRILLING FLUIDS TO BE USED

Imperial Oil and Gas admit that it’s wells are designed to be drilled utilising water-based muds and drilling fluids.

Drilling Activities will create a range of waste including:

- Produced water which could include naturally occurring radioactive materials
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- Completion, suspension and kill fluids

IMPACTS TO AIR QUALITY

Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” This is a risk to the air quality of nearby communities.

Drilling fluids containing possible naturally occurring radioactive materials will be evaporated as much as possible; remaining fluid will be disposed of at a licenced facility. This use of evaporation also poses a real risk to the air quality of nearby communities.

TRANSPORT RISKS AND TOURISM IMPACTS

Traffic management; specifically the management of unsealed access tracks during the wet season increases the risks of accidents, erosion, spills and leaks. Furthermore, the increase in traffic movements potentially carrying toxic waste will have a negative impact on the Northern Territory’s tourism sector that is already under stress from Covid 19. This is unacceptable.

BUSHFIRE RISKS DUE TO DRILLING ACTIVITIES

This area is sensitive to bushfires. Rural Fire Brigades have been calling for gas companies to stop ignition sources and flaring on total fire ban days. Imperial Oil and Gas admit that “In the event of produced gas, flaring rather than venting will be implemented for emergency purposes.” Imperial Oil and Gas must be made to stop all flaring on total fire ban days.

REHABILITATION CONSIDERATIONS

Imperial Oil and Gas has admitted in their revised EMP that they have “no specific considerations” for rehabilitation regarding the well site or access to well site. This is not

good enough. Until Imperial Oil and Gas can prove to the community that they can rehabilitate these sites their drilling program should not proceed.

Thank you for considering my concerns,

Yours sincerely,

Carmel Young

This email was sent by Carmel Young via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at *****, however Carmel provided an email address (*****) which we included in the REPLY-TO field.

Please reply to Carmel Young at *****.

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Young, Jacqui – Thursday, 30 July 2020 – 17:40:25

Subject	Objection to Imperial Oil and Gas wet season drilling program EP 187
From	Jacqui Young
Sent	7/30/2020 5:40:25 PM

Dear Department of Environment and Natural Resources,

I am writing to express my objection to the Revised Environmental Management Plan submitted by Imperial Oil and Gas for their 2020 Drilling Program NT Exploration Permit (EP) 187.

My key concerns with this plan are outlined below.

IMPACTS TO PEOPLE AND COMMUNITIES

There are a number of possible negative impacts to people and communities posed by Imperial's drilling program including:

- Increased potential for accidents and damage to infrastructure due to vehicle movements,
- Impact to onsite indigenous heritage site not previously identified,
- Land biodiversity impact due to heavy machinery movements,
- Increased intensity of flooding from land clearing and drilling activities,
- Noise and vibration due to vehicles movements, civil works and drilling activities,
- Light pollution due to artificial lighting required for safe operations,
- Disturbance to heritage sites due to works conducted out of the approved areas.
- Road users, landholders discontent due to loss of visual amenity,

There are a number of pastoral properties with livestock and infrastructure in the vicinity or the Tenement. The nearest property is OT Downs Homestead located approximately 20km North-West of the proposed area.

USING OPEN PITS AND UNATTENDED OPEN-TOP TANKS IN THE WET SEASON POSES AN UNACCEPTABLE RISK

It is unacceptable that Imperial Oil and Gas would use open pits and unattended open-top tanks in the wet season and risk the likelihood of overtopping.

These open pits are full of heavy metals, biocides and naturally occurring radioactive materials.

Using open pits and unattended open-top tanks in the wet season poses a risk to soil, water and the threatened birdlife that visits the site, including the Gouldian Finch, and should not be open and accessible to birdlife at any time.

WET SEASON RISKS WITH WASTE ON SITE

The summer monsoon season brings rain and cyclones and during this period the project area can experience significant rainfall events.

It is deeply concerning that instead of storing toxic wastewater in enclosed tanks, Imperial Oil and Gas is planning to use open pits and unattended open-top tanks in the wet season. Not only could this kill birds, but extreme weather events could cause downstream pollution impacts.

The Imperial Oil and Gas drilling program is at odds with the NT Fracking Inquiry recommendation 7.12. The Inquiry stated that: “enclosed tanks must be used to hold all wastewater.”

DISPOSAL OF WASTE

Cuttings and solid drilling residue initially stored in a lined pit. Subject to sampling and testing results drill cuttings will be buried and disposed in-situ (on site). This disposal of potentially hazardous waste on site is a threat to soil and water quality in the area.

If certification and DENR approval cannot be obtained for on-site disposal then this waste will be disposed of to a licensed facility in Queensland. Residual drilling mud in the drill cuttings sump that does not evaporate and fails to meet disposal requirements as outlined in the Code will be removed from site, before the onset of monsoon rains for disposal at a licensed facility in Queensland. This is not good enough, if this waste is too dangerous for the NT why should Queenslanders be forced to live with their toxic waste disposal?

THREATENED SPECIES IN THE AREA

There are 13 threatened species listed as potentially occurring within the project area, which includes a range of birds, mammals and reptiles.

The Environment Protection & Biodiversity Conservation Protected Matters Search Tool identified 13 threatened species that have the potential to occur in the Project Area. Of these, the Gouldian Finch have a high potential to occur and Yellow-Spotted Monitor has a moderate likelihood of occurrence.

IMPACTS UPON GROUNDWATER AND SURFACE WATER

A number of negative impacts to water are posed by Imperial’s drilling program including:

- Impact to groundwater quality and groundwater dependent ecosystems due to well integrity failure.
- Impact to hydrological systems due to chemical spills, lack of appropriate bunding and poor fuel, oil and chemical handling,
- Contamination of water bodies due to storage (tank/vessels) failure,
- Impact to surface water due to inappropriate management of waste

The McArthur River is the primary surface water, water drain of the exploration area. This water course drains the whole area into the Gulf of Carpentaria.

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